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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION

14 APPLE INC., a California corporation,

15 Plaintiff,

16 v.

17 SAMSUNG ELECTRONICS CO., LTD., a  
18 Korean corporation; SAMSUNG  
19 ELECTRONICS AMERICA, INC., a New  
20 York corporation; and SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company,

21 Defendants.

Case No. 11-cv-01846-LHK

**APPLE'S MOTION TO SEAL  
REGARDING APPLE INC.'S  
MOTION TO MODIFY APRIL 29,  
2013, CASE MANAGEMENT ORDER  
EXCLUDING EVIDENCE OF  
CERTAIN INFUSE 4G SALES OR, IN  
THE ALTERNATIVE, FOR LEAVE  
TO SEEK RECONSIDERATION OF  
THAT ORDER, AND TO CLARIFY  
THAT THE ORDER APPLIED  
SOLELY TO THE INFUSE 4G**

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62, Apple  
2 submits this motion for an order to seal the following documents or portions thereof relating to  
3 Apple’s Motion to Modify April 29, 2013, Case Management Order Excluding Evidence of  
4 Certain Infuse 4G Sales or, in the Alternative, for Leave to Seek Reconsideration of that Order,  
5 and to Clarify that the Order Applied Solely to the Infuse 4G (“Apple’s Motion to Modify April  
6 29, 2013, Case Management Order”):

- 7 1. Declaration of Erik J. Olson in Support of Apple’s Motion to Modify April 29,  
8 2013, Case Management Order (the “Olson Declaration”);
- 9 2. Exhibits B, C, and D to the Olson Declaration.

10 The above documents contain information that Samsung indicated in previous filings it  
11 believes should be sealed. Apple expects that pursuant to Civil Local Rule 79-5(d), Samsung will  
12 file a declaration supporting the filing of these materials under seal.

13 Dated: July 17, 2013

MORRISON & FOERSTER LLP

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16 By: /s/ Harold J. McElhinny  
HAROLD J. MCELHINNY

17 Attorneys for Plaintiff  
18 APPLE INC.