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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 (PSG)

**APPLE’S MOTION TO SEAL
REGARDING APPLE’S
OPPOSITION TO SAMSUNG’S
MOTION FOR NEW TRIAL
REGARDING ’381 PATENT
PURSUANT TO RULE 59 BASED ON
“NEWLY DISCOVERED
EVIDENCE” OR, ALTERNATIVELY,
FOR ENTRY OF JUDGMENT ON
LIABILITY**

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 Opposition to Samsung's Motion for New Trial Regarding '381 Patent Pursuant to Rule
4 59 Based on "Newly Discovered Evidence" Or, Alternatively, For Entry of Judgment on Liability
5 ("Apple's Opposition to Samsung's Motion for New Trial"):

- 6 1. Apple's Opposition to Samsung's Motion for New Trial;
- 7 2. Declaration of Ravin Balakrishnan in Support of Apple's Opposition to Samsung's
8 Motion for New Trial (the "Balakrishnan Declaration");
- 9 3. Exhibit A to the Balakrishnan Declaration.

10 The above documents contain information that Samsung has designated confidential, in
11 particular references to and discussion of Samsung source code. Apple expects that pursuant to
12 Civil Local Rule 79-5(d), Samsung will file a declaration supporting the filing of these materials
13 under seal.

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15 Dated: July 22, 2013

MORRISON & FOERSTER LLP

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

18 Attorneys for Plaintiff
19 APPLE INC.
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