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Attorneys for Plaintiff and Counterclaim Defendant Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

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

Defendants.

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

Counterclaim-Plaintiffs,

v.

APPLE INC., a California corporation,

Counterclaim-Defendant.

CASE NO. 12-cv-00630-LHK (PSG)

**APPLE INC.'S ADMINISTRATIVE MOTION
TO FILE DOCUMENTS UNDER SEAL**

1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple Inc. (“Apple”)
2 hereby moves this Court for an order to seal portions of Exhibit 1 to the Declaration of Joshua
3 Furman in Support of Apple’s Motion for Leave to Amend and Supplement Its Infringement
4 Contentions (“Furman Declaration”).

5 Apple sets forth good cause to permit filing these documents under seal through
6 the Declaration of Robert Vincent in Support of Apple’s Administrative Motion to File Documents
7 Under Seal (“Vincent Decl.”), filed herewith. As explained in the Vincent Declaration, the above
8 documents discuss and refer to documents and things that Samsung and third-party Google Inc. have
9 designated as “HIGHLY CONFIDENTIAL - ATTORNEYS’ EYES ONLY – SOURCE CODE,” and
10 “GOOGLE’S HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE
11 CODE” under the Agreed Upon Protective Order Regarding Disclosure and Use of Discovery
12 Materials and the Stipulated Amendment to the Protective Order Regarding Google Code Production.
13 Apple accordingly files these documents under seal, and expects that Samsung and Google will
14 comply with L.R. 79-5(d) by filing an appropriate declaration with the Court within seven days for
15 those portions and documents that Samsung- and Google-designated information. Apple’s entire
16 filing will be lodged with the Court for in camera review and served on all parties.

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20 Dated: May 21, 2013

GIBSON, DUNN & CRUTCHER LLP

21 By: /s/ H. Mark Lyon
22 H. Mark Lyon
23 *Attorney for Apple Inc.*
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule 5-1, and will be served on all counsel for Google, Inc. who have consented to electronic service in accordance with the Northern District of California Local Rules via the Court's ECF system.

Dated: May 21, 2013

/s/ H. Mark Lyon

H. Mark Lyon

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