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11 Attorneys for Non-Party,
12 MOTOROLA MOBILITY LLC

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 APPLE, INC., a California Corporation,

17 Plaintiff,

18 v.

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

23 Defendants.

CASE NO.: 11-CV-01846-LHK

**NON-PARTY MOTOROLA
MOBILITY LLC'S MOTION FOR
LEAVE TO FILE REPLY TO
REUTERS AMERICA LLC'S
OPPOSITION TO MOTIONS TO
SEAL TRIAL AND PRETRIAL
EVIDENCE**

Date: Expedited Request
Courtroom: 8, 4th Floor
Judge: Hon. Lucy H. Koh

1 Non-Party Motorola Mobility LLC respectfully requests leave to file a reply to address
2 Reuters America LLC's Opposition to Motions to Seal Trial and Pretrial Evidence. As set forth
3 in Motorola's reply, attached as Exhibit A to the declaration of Jennifer A. Golinveaux filed
4 herewith, Reuter's fails to rebut the particularized document-by-document showing of the harm
5 that would result from disclosure of the Motorola confidential information that was the subject of
6 Motorola's motion. Instead of refuting the facts and specific concerns of the non-parties at hand,
7 Reuters relies on a joint declaration of five college professors who do not even purport to know
8 the facts of the situation (Dkt. No. 1556-4). Even Reuters' declarants "recognize and respect the
9 value of confidentiality with respect to licensing data."

10 In light of Reuter's inadequate argument directed at Motorola's administrative motion to
11 seal, Motorola respectfully requests leave to file a short reply to address this argument.

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13 Dated: August 6, 2012

WINSTON & STRAWN LLP

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15 By: /s/ Jennifer A. Golinveaux
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