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7 INTERDIGITAL TECHNOLOGY
CORPORATION and
8 INTERDIGITAL COMMUNICATIONS LLC

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 APPLE, INC., a California Corporation,)

14 Plaintiff,)

15 v.)

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

19 Defendants.)
20)
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28)

CASE NO.: 11-CV-01846-LHK

**INTERDIGITAL'S JOINDER IN
THIRD PARTY REPLIES TO
REUTERS' SUPPLEMENTAL
OPPOSITION TO THIRD PARTY
MOTIONS TO SEAL**

1 Non-parties InterDigital Technology Corporation and InterDigital Communications, LLC
2 (collectively, "InterDigital") join in the replies filed by Motorola (Dkt. No. 1594) and Nokia
3 (Dkt. No. 1609) in connection with Reuters America LLC's Opposition to Motions to Seal Trial
4 and Pretrial Evidence (Dkt. No. 1556).

5 Specifically, InterDigital respectfully submits that, as already noted in Motorola's and
6 Nokia's replies, Reuters' opposition is misplaced because: (1) it is contrary to the law of the
7 Ninth Circuit and the overwhelming majority of courts; (2) it improperly lumps together
8 arguments against Samsung's, Apple's and all the third parties' motions to seal in a single
9 opposition that fails to address on an individualized basis whether each of the third parties'
10 requests to seal meets the compelling reasons standard; (3) it illogically argues that the
11 inadvertent disclosure of IBM's and Qualcomm's agreements with Samsung and a court-ordered
12 "exacting and even-handed" disclosure of confidential terms of the third parties' licenses (the
13 practical possibility of which is highly questionable) somehow moots the third parties'
14 competitive harm concerns; and (4) it relies on declarants that do not purport to know or address
15 facts particular to of each of the third parties that were thrust into this litigation (Dkt. No. 1556-
16 4). If anything, the Reuters declarants confirm that licensing terms are trade secrets when they
17 state that they "recognize and respect the value of confidentiality with respect to licensing data."
18 *Id.* ¶ 7.

19 In addition, InterDigital emphasizes that its motion to seal and its proposed redactions of
20 licensing terms are narrowly tailored to protect only competitively sensitive business
21 information. Because Reuters failed to refute nonparty InterDigital's showing of compelling
22 reasons for sealing its confidential licensing terms, InterDigital respectfully requests that the
23 Court grant InterDigital's motion to seal.

24
25 Dated: August 8, 2012

Respectfully submitted,

26 WILSON SONSINI GOODRICH & ROSATI
27 Professional Corporation

By: /s/ Michael B. Levin

Michael B. Levin

Attorneys for Non-Parties
INTERDIGITAL TECHNOLOGY
CORPORATION and
INTERDIGITAL COMMUNICATIONS, LLC

ATTESTATION OF E-FILED SIGNATURE

I, Corina I. Cacovean, am the ECF User whose ID and password are being used to file this Motion. In compliance with General Order 45, X.B., I hereby attest that Michael B. Levin has concurred in this filing.

Dated: August 8, 2012

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

/s/ Corina I. Cacovean
Corina I. Cacovean

Attorneys for Non-Parties
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