

MCKOOL SMITH HENNIGAN, P.C.  
Courtland L. Reichman (SBN 268873)  
creichman@mckoolsmith.com  
303 Twin Dolphin Drive, 6th Floor  
Redwood Shores, CA 94065  
Tel.: 650-394-1400  
Fax: 650-551-9901

*Attorneys for Non-Party  
Telefonaktiebolaget  
LM Ericsson*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE, INC., a California Corporation,

Plaintiff,

vs.

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

Defendants.

Case No. 5:11-CV-01846-LHK

**NON-PARTY TELEFONAKTIEBOLAGET  
LM ERICSSON'S MOTION FOR LEAVE TO  
FILE REPLY TO THIRD- PARTY  
INTERVENOR REUTERS AMERICA LLC'S  
OPPOSITION TO MOTION TO SEAL  
TRIAL AND PRETRIAL EVIDENCE**

1 Non-Party Telefonaktiebolaget LM Ericsson ("Ericsson") respectfully requests leave to reply  
2 to Third-Party Intervenor Reuters America LLC's ("Reuters") Opposition to Motion to Seal Trial  
3 and Pretrial Evidence (Doc. No. 1556). Ericsson's proposed reply is attached as Exhibit A to the  
4 declaration of Courtland L. Reichman filed herewith and in support of this motion. As set forth in  
5 the proposed reply, Ericsson will be harmed even if all license information at issue is disclosed,  
6 disclosure will not lead to market efficiency and will not improve damage determinations, and  
7 Reuters failed to address Ericsson's evidence in support of its motion. Ericsson seeks leave to  
8 address these matters.

9  
10 DATED: August 8, 2012

Respectively Submitted,

11 By: /s/ Courtland L. Reichman  
12 Courtland L. Reichman  
13 McKool Smith Hennigan, P.C.  
14 303 Twin Dolphin Drive, 6<sup>th</sup> Fl  
15 Redwood Shores, CA 94065

16 *Attorneys for Non-Party*  
17 *Telefonaktiebolaget LM Ericsson*  
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McKool Smith Hennigan P.C.  
303 Twin Dolphin Drive, Suite 600  
Redwood Shores, California 94065

**PROOF OF SERVICE**

I am employed in the County of San Mateo, State of California. I am over the age of 18 years and not a party to the within action; my business address is 303 Twin Dolphin Drive, Suite 600, Redwood Shores, California 94065.

On August 8, 2012, all counsel of record who are registered ECF users are being served with a copy of the foregoing document described as **NON-PARTY TELEFONAKTIEBOLAGET LM ERICSSON'S MOTION FOR LEAVE TO FILE REPLY TO THIRD- PARTY INTERVENOR REUTERS AMERICA LLC'S OPPOSITION TO MOTION TO SEAL TRIAL AND PRETRIAL EVIDENCE** via the Electronic Case Filing Program of the United States District Court for the Northern District of California per Local Rule 5-3.3.

Executed on August 8, 2012, at Redwood Shores, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Janet Wasson

Janet Wasson

McKool Smith Hennigan P.C.  
303 Twin Dolphin Drive, Suite 600  
Redwood Shores, California 94065