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15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN JOSE**

19 OpenTV, Inc., NagraVision, SA, and Nagra
20 France S.A.S.,

21 *Plaintiffs,*

22 v.

23 Apple Inc.,

24 *Defendant.*

Case No. 5:15-CV-02008-EJD

**APPLE, INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
DEFENDANT'S MOTION TO
PRECLUDE AND CERTAIN
SUPPORTING EXHIBITS**

1 Pursuant to Civil L.R. 79-5 (d) and (e), Defendant Apple, Inc. (“Apple”) hereby files this
2 administrative motion to file under seal portions of “Defendant’s Motion to Preclude Reliance on
3 Certain Invention Dates and to Strike Certain Allegations” (“Motion to Preclude”), as well as
4 supporting Exhibits 2, 7, and 8, filed herewith.

5 Apple brings this motion because the Motion to Preclude and Exhibits 2, 7, and 8 contain
6 information designated “Highly Confidential - Attorneys’ Eyes Only” by Plaintiffs.

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Dated: April 13, 2016

O’MELVENY & MYERS LLP

By: /s/ Melody Drummond Hansen
Melody Drummond Hansen

Attorney for Apple, Inc.

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CERTIFICATE OF SERVICE

Pursuant to Civil L.R. 5-5 and 79-5(e), I certify that I served the below documents by express mail at the address below and electronic mail at the email addresses below upon the below recipients on the below date.

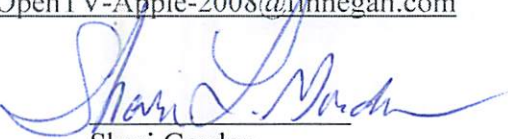
Documents:

- APPLE, INC.’S ADMINISTRATIVE MOTION TO FILE UNDER SEAL DEFENDANT’S MOTION TO PRECLUDE AND CERTAIN SUPPORTING EXHIBITS (attached to this administrative motion)
- DEFENDANT’S MOTION TO PRECLUDE RELIANCE ON CERTAIN INVENTION DATES AND TO STRIKE CERTAIN ALLEGATIONS (unredacted version) (attached to this administrative motion)
- DEFENDANT’S MOTION TO PRECLUDE RELIANCE ON CERTAIN INVENTION DATES AND TO STRIKE CERTAIN ALLEGATIONS (redacted version) (attached to this administrative motion)
- Unredacted Exhibits 2, 7, 8 (attached to this administrative motion)
- Proposed Order (attached to this administrative motion)
- Declaration of Melody Drummond Hansen in support of this Administrative Motion to Seal (attached to this administrative motion)

Recipient:

- Robert F. McCauley; Jacob A. Schroeder; Gerald F. Ivey; Smith R. Brittingham IV; Elizabeth A. Niemeyer; John M. Williamson; Aliza A. George; Robert D. Wells; Stephen E. Kabakoff
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Date: April 13, 2016



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