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NOKIA CORPORATION  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION  
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12  
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.  
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Case No.: 11-CV-01846-LHK

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

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

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1 Non-Party Nokia Corporation respectfully requests leave to file a brief reply to address  
2 Reuters America LLC's Supplemental Opposition to Motions to Seal Trial and Pretrial Evidence.  
3 As set forth in Nokia Corporation's reply, attached as Exhibit A to the declaration of Steven D.  
4 Hemminger filed herewith, Reuters fails to rebut the particularized showing of the harm that  
5 would result from disclosure of the Nokia confidential licensing information that was the subject  
6 of Nokia's motion. In addition, Reuters improperly relies on a joint declaration of five college  
7 professors who do not even purport to know the facts of the situation and who themselves  
8 "recognize and respect the value of confidentiality with respect to licensing data." (Dkt. No. 1556-  
9 4).

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11 DATED: August 7, 2012

Respectfully submitted,

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13 By: /s/ Steven D. Hemminger  
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*Attorneys for Non-Party Nokia Corporation*