16

17

18

19

20

21

22

23

24

25

26

27

28

Keith L. Slenkovich (SBN 129793) 1 Keith.Slenkovich@wilmerhale.com 2 Joseph F. Haag (SBN 248749) Joseph.Haag@wilmerhale.com 3 WILMER CUTLER PICKERING HALE AND DORR LLP 4 950 Page Mill Road Palo Alto, CA 94304 5 Telephone: (650) 858-6000 Facsimile: (650) 858-6100 6 William F. Lee (pro hac vice) 7 William.Lee@wilmerhale.com WILMER CUTLER PICKERING 8 HALE AND DORR LLP 60 State Street 9 Boston, MA 02109 Telephone: (617) 526-6000 10 Facsimile: (617) 526-5000 James M. Dowd (SBN 259578) 11 James.Dowd@wilmerhale.com Palo Alto, California 94304 WILMER CUTLER PICKERING HALE AND DORR LLP 350 S. Grand Avenue, Suite 2100 Los Angeles, CA 90071 Telephone: (213) 443-5300 Facsimile: (213) 443-5400

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

MEDIATEK INC. Plaintiff, v. FREESCALE SEMICONDUCTOR, INC.

Defendant.

Attorneys for Plaintiff MEDIATEK INC.

Civil Action No. 4:11-cv-05341 (YGR)

[PROPOSED] ORDER GRANTING MEDIATEK INC.'S STIPULATED ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

Hon. Jacqueline Scott Corley

4:11-cv-05341 (YGR) (JSC)

Upon consideration of MediaTek Inc.'s ("MediaTek's") Stipulated Administrative

Motion to File Documents Under Seal ("Motion to Seal"), the Joint Stipulation to MediaTek's

Motion to File Under Seal, and other supporting documents, this Court hereby GRANTS

MediaTek's Motion to File Under Seal:

- MediaTek shall file under seal the confidential, unredacted portions of MediaTek's letter brief in opposition to Freescale Semiconductor, Inc.'s letter brief motion to compel at Docket No. 194 and supporting documents listed below:
 - a. Portions of Declaration of Zoran Zvonar in Support of MediaTek's Opposition
 to Freescale's Letter Brief Regarding Practicing Products; and
 - Portions of Declaration of Joern Soerensen in Support of MediaTek's
 Opposition to Freescale's Letter Briefs Regarding the Production of
 Documents and Deposition Testimony.

These documents shall be designated and maintained as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" information under the terms of the Stipulated Amended Order (Dkt. No. 100) authorized by the Northern District of California pursuant to Patent L.R. 2-2.

Dated: September 23 , 2013.

United States Judge

Hon. Jacqueline Scott Corley