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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE INC., a California corporation,  
  
Plaintiff,  
  
v.  
  
SAMSUNG ELECTRONICS CO., LTD., a  
Korean corporation; SAMSUNG  
ELECTRONICS AMERICA, INC., a New  
York corporation; and SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company,  
  
Defendants.

Case No. 11-cv-01846-LHK

**[PROPOSED] ORDER GRANTING  
SAMSUNG'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL RE SAMSUNG'S  
MOTION FOR LEAVE TO SEEK  
RECONSIDERATION**

1 Defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and  
2 Samsung Telecommunications America, LLC (collectively, “Samsung”) filed Samsung’s  
3 Administrative Motion to File Documents Under Seal on May 26, 2012 (Dkt. No. 978) relating to  
4 Samsung’s Motion for Leave to Seek Reconsideration of the Court’s May 21, 2012 Order (the  
5 “Motion”) and supporting documents. Pursuant to Civil L.R. 79-5(d), Samsung moved to seal  
6 certain exhibits designated as “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY” under  
7 the protective order in this case. Pursuant to Civil L.R. 79-5(d), for the purpose of establishing  
8 that the designated information is sealable, Apple filed the Declaration of Cyndi Wheeler in  
9 Support of Samsung’s Motion to File Under Seal (“Wheeler Declaration”). The Wheeler  
10 Declaration provides sufficient evidence that the documents and information designated as  
11 confidential by Apple, and filed under seal by Samsung, are “privileged or protectable as a trade  
12 secret or otherwise entitled to protection under the law,” and thus sealable. Civil L.R. 79-5(a).

13 Accordingly, IT IS HEREBY ORDERED that the following documents shall be filed  
14 under seal, to the extent and as described in the Wheeler Declaration:

- 15 • Exhibits 1, 3, 6-10, 12-14, and 16 to the Declaration of Thomas Watson in Support of the  
16 Motion; and
- 17 • The confidential, unredacted version of the Motion.  
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20 **IT IS SO ORDERED.**

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22 Dated: \_\_\_\_\_

\_\_\_\_\_  
23 Hon. Lucy H. Koh  
24 United States District Court Judge  
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