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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

vs.

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

Defendants.

CASE NO. 11-cv-01846-LHK-PSG

**[PROPOSED] ORDER GRANTING  
SAMSUNG’S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung  
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung's Reply in  
Support of Motion to Strike Expert Testimony Based on Undisclosed Facts and Theories.

Samsung and Apple Inc. (“Apple”) have filed the declarations required under Civil L.R.  
79-5 and General Order No. 62 to provide evidence of good cause for this Court to permit filing  
under seal. The declarations establish that the below documents contain information that has  
been designated by the parties as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY.

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Accordingly, for good cause shown, the Court ORDERS that the following documents shall be filed under seal:

1. The confidential, unredacted version of Samsung's Reply in Support of Motion to Strike Expert Testimony Based on Undisclosed Facts and Theories ("Reply");
2. The confidential, unredacted version of the Declaration of Michael J. Wagner in Support of the Reply ("Wagner Declaration");
3. Exhibits B and C to the Wagner Declaration; and
4. Exhibits 1-6, 13, 20-21, and 29-30 to the Declaration of Christopher E. Price in Support of the Reply ("Price Declaration").

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2012

\_\_\_\_\_  
Honorable Paul S. Grewal  
United States Magistrate Judge