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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

**[PROPOSED ORDER] GRANTING
APPLE'S ADMINISTRATIVE MOTIONS
TO FILE DOCUMENTS UNDER SEAL**

Apple, Inc. ("Apple") has filed several Administrative Motions to File Documents Under Seal (Dkt. Nos. 991, 997, 1004 and 1035). Pursuant to Civil L.R. 79-5(d), Apple moved to seal certain documents and information designated as "HIGHLY CONFIDENTIAL—ATTORNEYS EYES ONLY" by defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively "Samsung").

Samsung has filed the declaration required under Civil L.R. 79-5(d) and General Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The declaration

1 establishes that information contained in the below documents has been designated as HIGHLY
2 CONFIDENTIAL – ATTORNEY’S EYES ONLY by Samsung.

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

- 5 • Exhibits C – J, N – R, V, and X to the Declaration of Terry L. Musika, CPA in Support
6 of Apple’s Opposition to Samsung’s Motion to Exclude Opinions of Certain of Apple’s
7 Experts (“Musika Declaration”);
- 8 • Exhibits H, and I to the Declaration of Mia Mazza in Support of Apple’s Opposition to
9 Samsung’s Motion to Exclude Opinions of Certain of Apple’s Experts (“Mazza
10 Declaration”);
- 11 • The confidential, unredacted version of Apple's Opposition to Samsung's Motion For
12 Summary Judgment;
- 13 • Exhibits A and B to the Declaration of Janusz A. Ordover, Ph.D. in Support of Apple’s
14 Opposition to Samsung’s Motion for Summary Judgment (“Ordover Declaration”); and
- 15 • The confidential, unredacted version of Apple’s Opposition to Samsung’s Motion for
16 Leave to File Motion for Reconsideration.

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18 **IT IS SO ORDERED.**

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20 DATED: _____, 2012

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Hon. Lucy H. Koh
United States District Judge

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