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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 the unredacted  
Declaration of Brian von Herzen in Support of Samsung's Reply in Support of Motion to Strike  
Expert Testimony Based on Undisclosed Facts and Theories ("von Herzen Dec.") and Exhibits 4-6  
thereto conditionally under seal.

Apple Inc. ("Apple") has filed the declaration 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

