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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  
OPENING MEMORANDUM  
REGARDING CLAIM  
CONSTRUCTION**

1 Defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and  
2 Samsung Telecommunications America, LLC (collectively, “Samsung”) filed a motion to file  
3 under seal (Dkt. No. 1090) relating to Samsung’s Opening Memorandum Regarding Claim  
4 Construction and related exhibits. Pursuant to Civil L.R. 79-5(d), for the purpose of establishing  
5 that the designated information is sealable, Apple filed the Declaration of Cyndi Wheeler in  
6 Support of Samsung’s Motion to File Under Seal (“Wheeler Declaration”). The Wheeler  
7 Declaration provides sufficient evidence that certain documents and information designated as  
8 confidential by Apple, and filed under seal by Samsung, are “privileged or protectable as a trade  
9 secret or otherwise entitled to protection under the law,” and thus sealable. Civil L.R. 79-5(a).

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

- 12 • Exhibits 4, 17, and 18 to the Declaration of Adam S. Cashman in Support of Samsung’s  
13 Opening Memorandum Regarding Claim Construction;
- 14 • The confidential, unredacted version of Samsung’s Opening Memorandum Regarding  
15 Claim Construction.

16  
17 **IT IS SO ORDERED.**

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19 Dated: \_\_\_\_\_

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20 Hon. Lucy H. Koh  
21 United States District Court Judge  
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