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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 (PSG)

**[PROPOSED] ORDER GRANTING
SAMSUNG'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE SAMSUNG'S
REPLY IN SUPPORT OF MOTION
FOR SANCTIONS**

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. 1088) relating to Samsung’s Reply in Support of Motion for Rule 37
4 Sanctions and related exhibits. Pursuant to Civil L.R. 79-5(d), for the purpose of establishing that
5 the designated information is sealable, Apple filed the Declaration of Cyndi Wheeler in Support
6 of Samsung’s Motion to File Under Seal (“Wheeler Declaration”). The Wheeler Declaration
7 provides sufficient evidence that certain documents and information designated as confidential by
8 Apple, and filed under seal by Samsung, are “privileged or protectable as a trade secret or
9 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 • Exhibit 10 to the Reply Declaration of Diane C. Hutnyan in Support of Samsung’s Motion
13 for Rule 37 Sanctions;
- 14 • The confidential, unredacted version of Samsung’s Reply in Support of Motion for Rule
15 37 Sanctions.
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17 **IT IS SO ORDERED.**

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19 Dated: _____

20 Hon. Paul S. Grewal
United States Magistrate Judge
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