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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
Administrative Motion to File Documents Under Seal.

Samsung has filed the declarations required under Civil L.R. 79-5, General Order No. 62,
and this Court's July 17, 2012 Order to provide evidence of compelling reasons 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.

1 Accordingly, for good cause and compelling reasons shown, the Court ORDERS that the
2 following documents shall be filed under seal:

- 3 1. Samsung's Motion to Exclude Opinions of Certain of Apple's Experts
- 4 2. Ex. 1 to Martin Declaration in Support of Samsung's Notice of Motion and Motion
5 to Exclude Opinions of Certain of Apple's Experts
- 6 3. Ex. 2 to Martin Decl. of Giho Ro in Support of Samsung's Motion to Exclude
7 Opinions of Certain of Apple's Experts
- 8 4. Ex. 3 to Martin Declaration in Support of Samsung's Motion to Exclude Opinions of
9 Certain of Apple's Experts
- 10 5. Ex. 5 to Martin Declaration in Support of Samsung's Motion to Exclude Opinions of
11 Certain of Apple's Experts
- 12 6. Ex. 10 to Martin Declaration in Support of Samsung's Motion to Exclude Opinions
13 of Certain of Apple's Experts
- 14 7. Ex. F to Declaration of Terry L. Musika in Support of Apple's Opposition to
15 Samsung's Motion for Summary Judgment
- 16 8. Ex. G to Declaration of Terry L. Musika in Support of Apple's Opposition to
17 Samsung's Motion for Summary Judgment
- 18 9. Exhibit O to the Declaration of Michel Maharbiz in Support of Apple's Opposition
19 to Samsung's Motion for Summary Judgment
- 20 10. Ex. 37 to Declaration of Peter Bressler in support of Apple's Opposition to
21 Samsung's Motion for Summary Judgment
- 22 11. Ex. B to Declaration of Michael J. Wagner in Support of Samsung's Reply in
23 Support of Motion to Strike Expert Testimony Based on Undisclosed Facts and
24 Theories
- 25 12. Apple's Opposition to Samsung's Motions in Limine
- 26 13. Ex. 42 to Declaration of Kanada in Support of Apple's Opposition to Samsung's
27 Motions in Limine

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14. Ex. 43 to Declaration of Kanada in Support of Apple’s Opposition to Samsung’s
Motions in Limine

15. Ex. 44 to Declaration of Kanada in Support of to Apple’s Opposition to Samsung’s
Motions in Limine

IT IS SO ORDERED.

DATED: _____, 2012

Honorable Luch H. Koh
United States District Judge