

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Edward DeFranco (Cal. Bar No.165596)
 10 eddefranco@quinnemanuel.com
 51 Madison Avenue, 22nd Floor
 11 New York, New York 10010
 Telephone: (212) 849-7000
 12 Facsimile: (212) 849-7100

13 Michael T. Zeller (Cal. Bar No. 196417)
 michaelzeller@quinnemanuel.com
 14 865 S. Figueroa St., 10th Floor
 Los Angeles, California 90017
 15 Telephone: (213) 443-3000
 Facsimile: (213) 443-3100

16 Attorneys for Samsung Electronics America, Inc.
 17 and Samsung Telecommunications America LLC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
 24 Korean business entity; SAMSUNG
 ELECTRONICS AMERICA, INC., a New
 25 York corporation; SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 26 LLC, a Delaware limited liability company,

27 Defendants.

CASE NO. 11-cv-01846-LHK

**[PROPOSED] ORDER GRANTING
 SAMSUNG'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

**Date: August 24, 2011
 Time: 2:00 pm
 Place: Courtroom 4, 5th Floor
 Judge: Hon. Lucy H. Koh**

1 Samsung Electronics America, Inc. (“SEA”) and Samsung Telecommunications
2 America, LLC (“STA”) (collectively “Samsung”) have filed Samsung’s Administrative Motion to
3 File Documents Under Seal (“Administrative Motion”). The Administrative Motion requests that
4 portions of the Declaration of Eunha Kim In Support of Samsung’s Reply In Support of its Motion
5 to Disqualify Bridges & Mavrakakis LLP. (the “Kim Reply Declaration”), Exhibit F attached to
6 the Declaration of Austin Tarango In Support of Samsung's Reply In Support of its Motion to
7 Disqualify Bridges & Mavrakakis, LLP (“Tarango Reply Declaration”) and the corresponding
8 discussion of this confidential information in Samsung's Reply In Support of Its Motion to
9 Disqualify Bridges & Mavrakakis LLP (“Reply”).

10 Samsung has filed the declarations required under Civil L.R. Rule 79-5 and General Order
11 No. 62 to provide evidence of good cause for this Court to permit filing under seal. The
12 declaration establish that the information contained in the below documents is confidential and
13 therefore sealable.

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

- 16 • Paragraphs 5-6 of the Kim Reply Declaration;
- 17 • Exhibit F of the Tarango Reply Declaration; and
- 18 • The corresponding discussions of this confidential information in Samsung's Reply.

19
20 **IT IS SO ORDERED.**

21
22 DATED: _____, 2011

23 _____
24 The Honorable Lucy H. Koh
25 United States District Court Judge