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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

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

Date: October 13, 2011

Time: 1:30 pm

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

Samsung Electronics Co. Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA") and Samsung Telecommunications America, LLC ("STA") (collectively, "Samsung") have filed Samsung's Administrative Motion to File Documents Under Seal ("Administrative Motion"). The Administrative Motion requests that portions of Samsung's filing in opposition to Apple Inc.'s ("Apple") Motion for a Preliminary Injunction be filed under seal.

Samsung has filed the declaration required under Civil L.R. Rule 79-5 and General Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The declaration establishes that the information contained in the below documents has been designated

1 as confidential by Apple or includes confidential Samsung information and therefore is sealable.
2 Apple does not oppose this administrative motion.

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

- 5 • Exhibits M, N, O, LL, P, FF, HH, MM, NN, and OO to the Declaration of Sara
6 Jenkins in Support of Samsung's Opposition to Apple's Motion for a Preliminary
7 Injunction;
- 8 • The Declaration of Michael Wagner in Support of Samsung's Opposition to
9 Apple's Motion for a Preliminary Injunction;
- 10 • Paragraph 58 and Exhibit 3 of the Declaration of Jeffrey Johnson in Support of
11 Samsung's Opposition to Apple's Motion for a Preliminary Injunction;
- 12 • The confidential, unredacted version of Samsung's Opposition to Apple's Motion
13 for a Preliminary Injunction which includes the information discussed in the
14 documents above.

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17 **IT IS SO ORDERED.**

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19 DATED: _____, 2011

20 _____
The Honorable Lucy H. Koh
United States District Court Judge