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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 SEALING
SAMSUNG'S SUPPORTING
MATERIALS AND UNREDACTED
OPPOSITION TO APPLE'S MOTION
FOR A PRELIMINARY
INJUNCTION**

Date:
Time:
Place:
Judge: Hon. Lucy H. Koh

1 Defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and
2 Samsung Telecommunications America, LLC (collectively, “Samsung”) filed Samsung’s
3 Stipulated Administrative Motion to File Under Seal Pursuant to Civil Local Rules 7-11 and 79-5
4 on August 22, 2011 in support of Samsung’s Opposition to Apple’s Motion for a Preliminary
5 Injunction. (D.N. 175.) Pursuant to Civil L.R. 79-5(d), Samsung moved to seal certain documents
6 designated as “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES
7 ONLY” by plaintiff Apple Inc. (“Apple”) under the interim protective order for the Northern
8 District of California. Also pursuant to Civil L.R. 79-5(d), for the purpose of establishing that the
9 designated information is sealable, Apple filed the Declaration of Cyndi Wheeler in Support of
10 Sealing Samsung’s Supporting Materials and Unredacted Opposition to Apple’s Motion for a
11 Preliminary Injunction (“Wheeler Declaration”). The Wheeler Declaration provides sufficient
12 evidence that the documents and information designated as confidential by Apple, and filed under
13 seal by Samsung, are “privileged or protectable as a trade secret or otherwise entitled to
14 protection under the law,” and thus sealable. Civil L.R. 79-5(a).

15
16 Accordingly, IT IS HEREBY ORDERED that the following documents shall be filed
17 under seal:

- 18 • Exhibits M, N, O, LL, P, FF, HH, MM, NN, OO, and QQ to the Declaration of Sara
19 Jenkins in Support of Samsung’s Opposition to Apple’s Motion for a Preliminary
20 Injunction (D.N. 179);
- 21 • The Declaration of Michael Wagner in Support of Samsung’s Opposition to Apple’s
22 Motion for a Preliminary Injunction (“Wagner Declaration”) (D.N. 173);
- 23 • Exhibit B to the Wagner Declaration; and
- 24 • The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion for a
25 Preliminary Injunction, which includes information from the documents discussed above.
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IT IS SO ORDERED.

Dated: _____

Hon. Lucy H. Koh
United States District Judge