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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**

Samsung Electronics Co. Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA") and Samsung Telecommunications America, LLC ("STA") (collectively, "Samsung") have filed Samsung's Stipulated Administrative Motion to File Documents Under Seal ("Motion to Seal"). The Administrative Motion requests that Samsung's Motion to Compel be filed under seal along with the confidential, unredacted version of the Supporting Declaration, and Exhibits D-L, and N-P of the Supporting Declaration.

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

1 declaration establishes that the information contained in the below documents has been designated
2 as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY by Apple. Apple does not
3 oppose this administrative motion.

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

- 6 1. Samsung’s Motion to Compel Apple to Produce Documents And Things In
7 Response to Samsung’s Request for Production No. 1 and Further Responses to
8 Interrogatories Nos. 1, 3, and 6 (“Motion to Compel”).
- 9 2. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
10 of Samsung’s Motion to Compel (the “Supporting Declaration”).
- 11 3. Exhibits D-L, and N-P to the Supporting Declaration.

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13 **IT IS SO ORDERED.**

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15 DATED: _____, 2011

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The Honorable Paul S. Grewal
United States District Court Magistrate Judge

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