

1 HAROLD J. MCELHINNY (CA SBN 66781)
2 hmcelhinny@mofo.com
3 MICHAEL A. JACOBS (CA SBN 111664)
4 mjacobs@mofo.com
5 RICHARD S.J. HUNG (CA SBN 197425)
6 rhung@mofo.com
7 MORRISON & FOERSTER LLP
8 425 Market Street
9 San Francisco, California 94105-2482
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

WILLIAM F. LEE
william.lee@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

7
8 Attorneys for Plaintiff and
9 Counterclaim-Defendant APPLE INC.

MARK D. SELWYN (SBN 244180)
mark.selwyn@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, California 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14
15 APPLE INC., a California corporation,

Case No. 11-cv-01846-LHK

16 Plaintiff,

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

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., A
19 Korean business entity; SAMSUNG
20 ELECTRONICS AMERICA, INC., a New York
corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company.,

21 Defendants.

22

23

24

25

26

27

28

[PROPOSED] ORDER GRANTING MOTION TO FILE DOCUMENTS UNDER SEAL
CASE No. 11-cv-01846-LHK
sf-3042291

1 Plaintiff Apple Inc. (“Apple”) has moved to file the certain documents related to Apple’s
2 Opposition to Samsung’s Motion to Compel Regarding Request For Production No. 1 and
3 Interrogatory Nos. 1, 3, and 6 under seal. In support of the Administrative Motion, Apple has
4 filed the declaration required under Civil L.R. Rule 79-5 and General Order No. 62 to provide
5 evidence of good cause for this Court to permit filing under seal. The declaration establishes that
6 the information contained in the below documents has been designated as HIGHLY
7 CONFIDENTIAL – ATTORNEY’S EYES ONLY by Apple. Samsung does not oppose this
8 administrative motion.

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

11 1. The confidential, unredacted version of Apple’s Opposition to Samsung’s Motion to
12 Compel Regarding Request For Production No. 1 and Interrogatory Nos. 1, 3, and 6
13 (“Opposition”)

14 2. The Declaration of Christopher J. Stringer in Support of Apple Inc.’s Opposition to
15 Samsung’s Motion to Compel Regarding Request for Production No. 1 and Interrogatory Nos. 1,
16 3, and 6 (“Stringer Declaration”).

17 3. The confidential, unredacted version of The Declaration of Jason Bartlett in Support of
18 Apple Inc.’s Opposition to Samsung’s Motion to Compel Regarding Request for Production No.
19 1 and Interrogatory Nos. 1, 3, and 6 (“Bartlett Declaration”).

20 4. Exhibits A, B, C, D, E, H, I and J to the Bartlett Declaration.

21 5. The Declaration of Patrick Zhang in Support of Apple Inc.’s Opposition to Samsung’s
22 Motion to Compel Regarding Request for Production No. 1 and Interrogatory Nos. 1, 3, and 6
23 (“Zhang Declaration”).

24

25

26

27

28

The Court further ORDERS that a redacted version of Apple's Opposition to Samsung's Motion to Compel and the Bartlett Declaration shall be filed on ECF.

IT IS SO ORDERED.

Dated: _____, 2011

By: HONORABLE PAUL GREWAL
UNITED STATES MAGISTRATE
JUDGE