

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

WILLIAM F. LEE  
[william.lee@wilmerhale.com](mailto: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

MARK D. SELWYN (SBN 244180)  
[mark.selwyn@wilmerhale.com](mailto: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

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 9 Attorneys for Plaintiff and  
 Counterclaim-Defendant APPLE INC.

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

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 15 APPLE INC., a California corporation,  
 16 Plaintiff,  
 17 v.  
 18 SAMSUNG ELECTRONICS CO., LTD., A  
 Korean business entity; SAMSUNG  
 19 ELECTRONICS AMERICA, INC., a New York  
 corporation; SAMSUNG  
 20 TELECOMMUNICATIONS AMERICA, LLC, a  
 Delaware limited liability company.,  
 21 Defendants.

Case No. 11-cv-01846-LHK

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

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”).

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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