

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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-PSG

**[PROPOSED] ORDER GRANTING
SAMSUNG’S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s
Administrative Motion to File Under Seal Documents in Support of its Opposition to Apple’s
Motion to Compel.

Samsung has filed the declaration required under Civil L.R. 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 information contained in the below documents has been designated as

1 HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY by both Apple and Samsung.

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 1. The confidential, unredacted version of the Declaration of Melissa Chan in Support
6 of Samsung’s Opposition to Apple’s Motion to Compel (the “Chan Declaration”);
- 7 2. Exhibits 10, 15-17 to the Chan Declaration;
- 8 3. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
9 of Samsung’s Opposition to Apple’s Motion to Compel (the “Jenkins
10 Declaration”);
- 11 4. The confidential, unredacted version of the Declaration of Russell Wilkins in
12 Support of Samsung’s Opposition to Apple’s Motion to Compel (the “Wilkins
13 Declaration”).

14 The Court further ORDERS that a redacted version of the Chan Declaration, the Jenkins
15 Declaration, and the Wilkins Declaration shall be filed on ECF.

17 **IT IS SO ORDERED.**

19 DATED: _____, 2011

22 _____
23 Hon. Paul S. Grewal
24 United States District Court Magistrate Judge