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 LTD., SAMSUNG ELECTRONICS AMERICA,
 14 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 18

19 APPLE INC., a California corporation,
 20 Plaintiff,
 21 vs.
 22 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 23 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 24 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 25 Defendant.
 26

CASE NO. 11-cv-01846-LHK

**[PROPOSED ORDER] SEALING
 APPLE'S MOTION TO COMPEL, THE
 DECLARATION OF MINN CHUNG, AND
 EXHIBIT J OF THE DECLARATION OF
 JASON R. BARTLETT IN SUPPORT OF
 APPLE'S MOTION TO COMPEL**

1 On September 21, 2011, Plaintiff Apple, Inc. (“Apple”) filed Apple’s Administrative
2 Motion to File Under Seal (Dkt No. 249) in connection with Apple’s Motion to Compel Samsung
3 to Produce Documents and Provide Responsive Answers to Propounded Discovery (“Apple’s
4 Motion to Compel”). Pursuant to Civil L.R. 79-5(d), Apple moved to seal certain documents and
5 information designated as “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL ATTORNEYS’
6 EYES ONLY” under the interim protective order for the Northern District of California by
7 defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
8 Telecommunications America, LLC (collectively “Samsung”).

9 Also pursuant to Civil L.R. 79-5(d), for the purpose of establishing that the designated
10 information is sealable, Samsung filed the Declaration of Hankil Daniel Kang in Support of
11 Sealing Apple’s Motion to Compel. The Kang Declaration provides sufficient evidence that the
12 documents and information designated as confidential by Samsung, and submitted under seal by
13 Apple, are “privileged or protectable as a trade secret or otherwise entitled to protection under the
14 law” and thus sealable. Civil L.R. 79-5(a).

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

- 17 • Sections II.B and II.C (on pages 6 and 7) of the Memorandum of Points and
18 Authorities submitted with Apple’s Motion to Compel;
- 19 • Page 9, line 25 to page 10, line 4 of the Memorandum of Points and Authorities
20 submitted with Apple’s Motion to Compel;
- 21 • Paragraphs 7, 8, 12, 13, 14, 16, 19, and 20 of the Declaration of Minn Chung in
22 Support of Apple’s Motion to Compel; and
- 23 • Exhibit J of the Declaration of Jason R. Bartlett in Support of Apple’s Motion to
24 Compel.

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IT IS SO ORDERED.

DATED: _____, 2011

Hon. Paul S. Grewal
United States District Court Magistrate Judge