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Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

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
 APPLE'S STIPULATED
 ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL ITS REPLY IN
 SUPPORT OF ITS MOTION FOR A
 PRELIMINARY INJUNCTION
 AND SUPPORTING DOCUMENTS**

1 By administrative motion, Plaintiff Apple Inc. (“Apple”) has moved to file under seal
2 portions of its Reply in Support of its Motion for a Preliminary Injunction and certain supporting
3 documents. In support of its motion, Apple has filed the declaration required under Civil L.R.
4 Rule 79-5 and General Order No. 62, which provides evidence of good cause for this Court to
5 permit filing under seal. The declaration establishes that information contained in the documents
6 listed below is “privileged or protectable as a trade secret or otherwise entitled to protection under
7 the law.” Civil L.R. 79-5(a). Apple’s request is narrowly tailored to seek the sealing only of
8 sealable information.

9 Samsung does not oppose this administrative motion.

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

- 12 1. The confidential, unredacted version of Apple’s Reply in Support of its Motion for
13 a Preliminary Injunction (“Reply”);
- 14 2. The confidential, unredacted version of the Reply Declaration of Tony Blevins in
15 Support of Apple’s Motion for a Preliminary Injunction (“Blevins Declaration”);
- 16 3. The Reply Declaration of Richard J. Lutton, Jr. in Support of Apple’s Motion for a
17 Preliminary Injunction (“Lutton Reply Declaration”);
- 18 4. Exhibits A, B, and C to the Lutton Reply Declaration;
- 19 5. The Reply Declaration of Terry Musika in Support of Apple’s Motion for a
20 Preliminary Injunction (“Musika Declaration”);
- 21 6. Exhibits 1, 2, 3, and 4 to the Musika Declaration;
- 22 7. The Reply Declaration of Arthur Rangel in Support of Apple’s Motion for a
23 Preliminary Injunction (“Rangel Declaration”);
- 24 8. Exhibits A, B, and C to the Rangel Declaration;
- 25 9. The confidential, unredacted version of the Reply Declaration of Sanjay Sood in
26 Support of Apple’s Motion for a Preliminary Injunction (“Sood Declaration”);
- 27 10. Exhibits D and H to the Sood Declaration;

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11. The Reply Declaration of Christopher Stringer in Support of Apple's Motion for a Preliminary Injunction ("Stringer Declaration");
12. Exhibits 1-9 to the Stringer Declaration;
13. The confidential, unredacted version of the Reply Declaration of Cooper C. Woodring in Support of Apple's Motion for a Preliminary Injunction ("Woodring Reply Declaration");
14. Exhibit 1 to the Woodring Reply Declaration; and
15. Exhibits A, B, C, D, M, P, S, W, Z, EE, FF, GG, JJ, KK and LL to the Declaration of Francis Ho in Support of Apple's Motion for a Preliminary Injunction.

The Court further ORDERS that redacted versions of the following documents shall be filed on ECF:

1. Apple's Reply in Support of its Motion for a Preliminary Injunction;
2. the Blevins Declaration;
3. the Sood Declaration; and
4. the Woodring Reply Declaration.

IT IS SO ORDERED.

Dated: _____, 2011

By: _____
HONORABLE LUCY H. KOH
UNITED STATES DISTRICT COURT
JUDGE