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 and Samsung Telecommunications America LLC
 14

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

17 APPLE INC., a California corporation,

18 Plaintiff,

19 vs.

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

23 Defendants.
 24

CASE NO. 11-cv-01846-LHK

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

1 **[PROPOSED] ORDER**

2 Samsung Electronics America, Inc. (“SEA”) and Samsung Telecommunications America,
3 LLC (“STA”) (collectively “Samsung”) have filed Samsung’s Administrative Motion to File
4 Documents Under Seal (“Administrative Motion”). The Administrative Motion requests that the
5 Declarations of Brian Rosenberg and Travis Merrill in support of Samsung’s Opposition to
6 Plaintiff’s Motion to Expedite Discovery (the “Rosenberg” and “Merrill” Declarations), and the
7 portions of Samsung’s Opposition to Plaintiff’s Motion to Expedite Discovery that reference these
8 declarations be filed under seal because they contain confidential information.

9 Samsung has filed the declarations required under Civil L.R. Rule 79-5 and General Order
10 No. 62 to provide evidence of good cause for this Court to permit filing under seal. Those
11 declarations establish that the information contained in the below documents is confidential and
12 therefore sealable.

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

- 15 • Declaration of Brian Rosenberg In Support of Samsung’s Opposition to Plaintiff’s
16 Motion to Expedite Discovery,
- 17 • Declaration of Travis Merrill In Support of Samsung’s Opposition to Plaintiff’s
18 Motion to Expedite Discovery, and
- 19 • The unredacted version of Samsung’s Opposition to Plaintiff’s Motion to Expedite
20 Discovery, which references confidential Samsung information contained in the
21 Rosenberg and Merrill Declarations.

22 **IT IS SO ORDERED.**

23
24 DATED: _____, 2011

The Honorable Lucy H. Koh
United States District Court Judge