

1 HAROLD J. MCELHINNY (CA SBN 66781)  
 2 [hmcelhinny@mofo.com](mailto:hmcelhinny@mofo.com)  
 3 MICHAEL A. JACOBS (CA SBN 111664)  
 4 [mjacobs@mofo.com](mailto:mjacobs@mofo.com)  
 5 RICHARD S.J. HUNG (CA SBN 197425)  
 6 [rhung@mofo.com](mailto:rhung@mofo.com)  
 7 MORRISON & FOERSTER LLP  
 8 425 Market Street  
 9 San Francisco, California 94105-2482  
 10 Telephone: (415) 268-7000  
 11 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

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 ADMINISTRATIVE  
 MOTION TO FILE APPLE'S  
 OBJECTIONS TO SAMSUNG'S  
 UNTIMELY NEW EVIDENCE  
 REGARDING PRELIMINARY  
 INJUNCTION MOTION AND  
 SUPPORTING DOCUMENTS  
 UNDER SEAL**

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

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

- 11 • Exhibit E to the Declaration of Grant Kim (“Kim Declaration”) (Stringer Deposition  
12 Excerpts);
- 13 • Exhibit G to the Kim Declaration (Wagner Deposition Excerpts).

14 **IT IS SO ORDERED.**

15  
16 Dated: \_\_\_\_\_, 2011

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