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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; 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
OPPOSITION TO SAMSUNG’S
MOTION TO COMPEL APPLE TO
PRODUCE DOCUMENTS AND
THINGS AND SUPPORTING
DOCUMENTS UNDER SEAL**

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

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

- 11 • Apple’s Opposition to Samsung’s Motion to Compel Apple to Produce Documents
12 and Things;
- 13 • Declaration of Michael A. Jacobs in Opposition to Samsung’s Motion to Compel
14 Documents and Things and its exhibit;
- 15 • Declaration of Wesley E. Overson in Opposition to Samsung’s Motion to Compel
16 Documents and Things;
- 17 • Declaration of Erik E. Olson in Opposition to Samsung’s Motion to Compel
18 Documents and Things and its exhibits other than Exhibit 7 and Exhibit 9;
- 19 • Declaration of Quin Hoellwarth in Opposition to Samsung’s Motion to Compel
20 Documents and Things;
- 21 • Declaration of Evans Hankey in Opposition to Samsung’s Motion to Compel
22 Documents and Things and its exhibits.

23 **IT IS SO ORDERED.**

24 DATED: _____, 2011.

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HONORABLE PAUL S. GREWAL
United States Magistrate Judge