

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

vs.

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-PSG

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

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s
Administrative Motion to File Documents Under Seal relating to the Declaration of Mark Tung in
Support of Samsung’s Notice of Lodging of Materials in Opposition to Apple’s Motion for a
Preliminary Injunctions (“Tung Declaration”) and Exhibits E, G, N, T, V, and X of the Tung
Declaration.

Samsung has filed the declaration required under Civil L.R. 79-5 and General
Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The

1 declaration establishes that the below documents contain information that has been designated as
2 HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY by Apple or HIGHLY
3 CONFIDENTIAL — ATTORNEYS’ EYES ONLY by Samsung, or sealed by order of this Court.

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

- 6 1. The Declaration of Mark Tung in Support of Samsung’s Notice of Lodging of
7 Materials in Opposition to Apple’s Motion for a Preliminary Injunctions (“Tung
8 Declaration”); and
- 9 2. Exhibits E, G, N, T, V, and X of the Tung Declaration.

10

11 **IT IS SO ORDERED.**

12

13 DATED: December _____, 2011

14

15

16

Hon. Lucy H. Koh
United States District Judge

17

18

19

20

21

22

23

24

25

26

27

28