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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 Motion to
File Documents Under Seal relating to Samsung’s Opening Claim Construction Brief.

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
declaration establishes that the below documents contain information that has been designated as
CONFIDENTIAL – ATTORNEY’S EYES ONLY by Apple, or sealed by order of this Court.

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

1. Confidential portions of Samsung’s Opening Claim Construction Brief;
2. Exhibits A and F attached to the Declaration of Todd Briggs in Support of Samsung's Opening Claim Construction Brief;
3. Confidential portions of the Declaration of Joe Tipton Cole in Support of Samsung’s Proposed Claim Construction for U.S. Patent No. 7,689,711 (“Cole Declaration”); and
4. Exhibits 3 and 4 attached to the Cole Declaration.

IT IS SO ORDERED.

DATED: _____

The Honorable Lucy H. Koh
United States District Court Judge