

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 Motion to Compel Production of Documents and Things and Responsive Answers to Propounded Discovery.

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

1 HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY by either Apple or Samsung, or
2 sealed by order of this Court.

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

- 5 1. The confidential, unredacted version of Samsung’s Motion to Compel Production
6 of Documents and Things and Responsive Answers to Propounded Discovery;
- 7 2. The confidential, unredacted version of the Declaration of Diane C. Hutnyan in
8 Support of Samsung’s Motion to Compel Production of Documents and Things and
9 Responsive Answers to Propounded Discovery;
- 10 3. Exhibits 1-13, 15-19, and 21 to the Declaration of Diane C. Hutnyan in Support of
11 Samsung's Motion to Compel Production of Documents and Things and
12 Responsive Answers to Propounded Discovery.

13
14 **IT IS SO ORDERED.**

15
16 DATED: December ___, 2011

17
18
19 _____
The Honorable Paul S. Grewal
20 United States Magistrate Judge
21
22
23
24
25
26
27
28