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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 DOCUMENTS
UNDER SEAL**

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

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

- 10 1. Apple’s Opposition to Samsung’s Motion to Compel.
- 11 2. Declaration of Mia Mazza in Support of Apple’s Opposition to Samsung’s Motion
12 to Compel.
- 13 3. Apple’s Opposition to Samsung’s Motion to Permit Samsung’s Expert Itay
14 Sherman to Review Design Materials Designated Under the Protective Order, filed
15 herewith.
- 16 4. Exhibits 3–6 to the Declaration of Esther Kim in Support of Apple’s Opposition to
17 Samsung’s Motion to Permit Samsung’s Expert Itay Sherman to Review Design
18 Materials Designated Under the Protective Order.
- 19 5. Samsung’s Notice of Motion and Motion to Compel Apple to Produce Documents
20 and Things and Provide Responsive Answers to Propounded Discovery;
21 Memorandum of Points and Authorities in Support Thereof, filed
22 December 13, 2011.
- 23 6. Declaration of Diane C. Hutnyan in Support of Samsung’s Motion to Compel
24 Production of Documents and Things and Provide Responsive Answers to
25 Propounded Discovery (“Hutnyan Decl.”), filed December 13. 2011.

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7. Hutnyan Decl. Exhibits 1-13 and 15-21.

IT IS SO ORDERED.

DATED: _____, 2011.

HONORABLE PAUL S. GREWAL
United States Magistrate Judge