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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 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.

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IT IS SO ORDERED.

DATED: December 16, 2011



The Honorable Paul S. Grewal
United States Magistrate Judge