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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 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

**[PROPOSED] ORDER GRANTING
SAMSUNG'S ADMINISTRATIVE
MOTIONS TO FILE DOCUMENTS
UNDER SEAL**

1 By administrative motion, Samsung moved to file the below-listed documents, which
2 contain Apple-confidential material, under seal. [Dkt. Nos. 542 and 548.] In support of
3 Samsung's motions, Apple has filed the declaration required under Civil L.R. Rule 79-5(d) and
4 General Order No. 62, which provides evidence of good cause for this Court to permit filing
5 under seal. The declaration establishes that information contained in the documents listed below
6 is "privileged or protectable as a trade secret or otherwise entitled to protection under the law."
7 Civil L.R. 79-5(a). The motion is narrowly tailored to seek the sealing only of sealable
8 information.

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

- 11 1. Exhibit B, I, and J to the Declaration of Todd M. Briggs in Support of Samsung's
12 Response to Apple's Opening Claim Construction Brief ("Briggs Declaration").
- 13 2. Samsung's Response to Apple's Opening Claim Construction Brief, to the extent it
14 discusses or quotes the contents of Exhibits B, I, or J to the Briggs Declaration.
- 15 3. Pages 74-76, 98, 209-10, 213, 222, 224-28, and 248 of Exhibit X to the
16 Declaration of Mark Tung in Support of Samsung's Notice of Lodging Materials
17 in Opposition to Apple's Motion for Preliminary Injunction ("Tung Declaration").

18 Exhibits M, N, S, and O to the Briggs Declaration and pages 24, 77-78, 100, 103, 106,
19 202-05, and 212 of Exhibit X to the Tung Declaration shall not be filed under seal.

20 **IT IS SO ORDERED.**

21 Dated: December _____, 2011.

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23 _____
24 HONORABLE LUCY H. KOH
25 United States District Judge
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