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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 certain motions filed by Samsung on January 10, 2012.

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. In
addition, Apple has filed the necessary declaration supporting Samsung's motion to seal. The
declarations establish that the below documents discuss or contain information that has been

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

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

- 5 1. Confidential portions of Samsung’s Notice of Motion and Motion to Compel Apple
6 to Produce Documents and Things; Memorandum of Points and Authorities in
7 Support Thereof;
 - 8 a. Confidential portions of the Declaration of Diane C. Hutnyan in Support of
9 Samsung’s Motion to Compel Apple to Produce Documents and Things;
 - 10 b. Exhibits A, B, D, J-Z, AA-CC of the Declaration of Diane C. Hutnyan in
11 Support of Samsung’s Motion to Compel Apple to Produce Documents and
12 Things;
- 13 2. Confidential portions of Samsung’s Renewed Motion to Compel Discovery
14 Relating to Mac OS 10.0; Memorandum of Points and Authorities in Support
15 Thereof;
 - 16 a. Exhibits A-C of the Declaration of Diane C. Hutnyan in Support of
17 Samsung’s Renewed Motion to Compel Discovery Relating to Mac OS
18 10.0;
- 19 3. Confidential portions of Samsung’s Motion to Enforce Various Court Orders
20 Requiring the Production of Materials Relevant to Apple’s Asserted Design
21 Patents; Memorandum of Points and Authorities in Support Thereof;
 - 22 a. Exhibits C, D, F and I of the Declaration of Diane C. Hutnyan in Support of
23 Samsung’s Motion to Enforce Various Court Orders Requiring the
24 Production of Materials Relevant to Apple’s Asserted Design Patents;
- 25 4. Confidential portions of Samsung’s Motion for Clarification Regarding the Court’s
26 December 22, 2011 Order (Dkt No. 535);

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- a. Confidential portions of the Declaration of Brett Arnold in support of Samsung’s Motion for Clarification Regarding the Court’s December 22, 2011 Order (Dkt No. 535);
 - b. Exhibits A-J of the Declaration of Brett Arnold in Support of Samsung’s Motion for Clarification Regarding the Court’s December 22, 2011 Order (Dkt No. 535);
5. Samsung’s Notice of Motion and Motion for a Protective Order
- a. Exhibits B-K of the Declaration of Diane C. Hutnyan in Support of Samsung's Motion for a Protective Order

IT IS SO ORDERED.

DATED: _____

HONORABLE PAUL S. GREWAL
United States Magistrate Judge