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Attorneys for Plaintiff and  
Counterclaim-Defendant APPLE INC.

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; and  
SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC, a Delaware limited liability  
company,  
  
Defendants.

Case No. 11-cv-01846-LHK

**[PROPOSED] ORDER GRANTING  
APPLE'S MOTION TO FILE UNDER  
SEAL ITS MOTION TO COMPEL  
PRODUCTION OF DOCUMENTS  
AND THINGS**

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In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple Inc. (“Apple”) has moved for an order to seal the following documents:

1. Apple’s Motion to Compel Production of Documents and Things;
2. Exhibits A, H, and J to the Declaration of Mia Mazza in Support of Apple’s Motion to Compel Production of Documents and Things.

Having considered the arguments of the parties and the papers submitted, and GOOD CAUSE HAVING BEEN SHOWN, the Court hereby GRANTS Apple’s Motion to File Under Seal.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_ By: \_\_\_\_\_  
Honorable Paul S. Grewal, U.S.M.J.