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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 UNDER  
SEAL ITS OPPOSITION TO APPLE’S  
MOTION TO COMPEL DOCUMENTS  
AND THINGS**

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung  
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s  
Administrative Motion to File Documents Under Seal relating to Samsung’s Opposition to  
Apple’s Motion to Compel Documents and Things, the Declaration of Melissa Chan in Support of  
Samsung’s Opposition to Apple’s Motion to Compel Documents and Things (“Chan  
Declaration”), Exhibits 1 and 4 of the Chan Declaration, and the Declaration of Hankil Kang in  
Support of Samsung’s Opposition to Apple’s Motion to Compel Documents and Things (the  
"Kang Declaration").

1 Samsung has filed the declaration required under Civil L.R. 79-5 and General  
2 Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The  
3 declaration establishes that the below documents contain information that has been designated as  
4 **HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY** by the parties.

5 Accordingly, for good cause shown, the Court **ORDERS** that the following documents  
6 shall be filed under seal:

- 7 1. The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion  
8 to Compel Documents and Things;
- 9 2. The confidential, unredacted version of the Declaration of Melissa Chan in Support  
10 of Samsung’s Opposition to Apple’s Motion to Compel Documents and Things  
11 (“Chan Declaration”);
- 12 3. Exhibits 1 and 4 of the Chan Declaration; and
- 13 4. The Declaration of Hankil Kang in Support of Samsung’s Opposition to Apple’s  
14 Motion to Compel Documents and Things.

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16 **IT IS SO ORDERED.**

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18 DATED: \_\_\_\_\_, 2012

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22 Hon. Paul S. Grewal  
23 United States Magistrate Judge  
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