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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 RELATING TO
AFFIRMATIVE DEFENSES/
COUNTERCLAIMS**

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s
Administrative Motion to File Under Seal Its Opposition to Apple’s Motion to Compel Relating to
Affirmative Defenses/Counterclaims, the Declaration of Rosa Kim in Support of Samsung’s
Opposition to Apple’s Motion to Compel Relating to Affirmative Defenses/Counterclaims, the
Declaration of Melissa Chan in Support of Samsung’s Opposition to Apple’s Motion to Compel
Relating to Affirmative Defenses/Counterclaims (“Chan Declaration”) and Exhibits 1, 2, 7, 8, 9,
10 and 11 of the Chan Declaration.

1 The parties have filed the declarations 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.

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 Opposition to Apple’s Motion
6 to Compel Relating to Affirmative Defenses/Counterclaims;
- 7 2. The confidential, unredacted version the Declaration of Rosa Kim in Support of
8 Samsung’s Opposition to Apple’s Motion to Compel Relating to Affirmative
9 Defenses/Counterclaims
- 10 3. The confidential, unredacted version of the Declaration of Melissa Chan in Support
11 of Samsung’s Opposition to Apple’s Motion to Compel Relating to Affirmative
12 Defenses/Counterclaims (“Chan Declaration”); and
- 13 4. Exhibits 1, 2, 7, 8, 9, 10 and 11 of the Chan Declaration.

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15 **IT IS SO ORDERED.**

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17 DATED: _____, 2012

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