

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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  
MOTION 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. No. 602.] In support of Samsung's  
3 motion, Apple has filed the declaration required under Civil L.R. Rule 79-5(d) and General Order  
4 No. 62, which provides evidence of good cause for this Court to permit filing under seal. The  
5 declaration establishes that information contained in the documents listed below is "privileged or  
6 protectable as a trade secret or otherwise entitled to protection under the law." Civil L.R. 79-5(a).  
7 The motion is narrowly tailored to seek the sealing only of sealable information.

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

- 10 1. Portions of Exhibits A, D, K, M, N, P, Q, U, W, Y, and Z to the Declaration of  
11 Diane C. Hutnyan in Support of Samsung's Motion to Compel ("Hutnyan  
12 Declaration ISO MtC") consistent with the proposed redacted exhibits identified in  
13 the Declaration of Cyndi Wheeler in Support of Samsung's Motion to File Under  
14 Seal ("Wheeler Declaration").
- 15 2. Exhibits L, M, S, and T to the Hutnyan Declaration ISO MtC in their entirety.
- 16 3. The Hutnyan Declaration ISO MtC and Samsung's Motion to Compel to the extent  
17 they refer to the above-referenced exhibits or confidential information therefrom.
- 18 4. Portions of Exhibit C to the Declaration of Diane C. Hutnyan in Support of  
19 Samsung's Renewed Motion to Compel consisted with the proposed redacted  
20 exhibit identified in the Wheeler Declaration.
- 21 5. Exhibit C to the Declaration of Diane C. Hutnyan in Support of Samsung's Motion  
22 to Enforce Various Court Orders ("Hutnyan Declaration ISO MtE") in its entirety.
- 23 6. Portions of Exhibit D to the Hutnyan Declaration ISO MtE consistent with the  
24 proposed redacted exhibit identified in the Wheeler Declaration.
- 25 7. Samsung's Motion to Enforce Various Court Orders to the extent it refers to the  
26 above-referenced exhibits or confidential information therefrom.
- 27 8. Exhibits A-E and G of the Declaration of Brett Arnold in Support of Samsung's  
28 Motion for Clarification ("Arnold Declaration") in their entirety.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- 9. Portions of Exhibits F and H to the Arnold Declaration consistent with the proposed redacted exhibits identified in the Wheeler Declaration.
- 10. Samsung’s Motion for Clarification and the Arnold Declaration to the extent they refer to the above-referenced exhibits or confidential information therefrom.
- 11. Portions of Exhibits B, C, D, and K to the Declaration of Diane C. Hutnyan in Support of Samsung’s Motion for a Protective Order (“Hutnyan Declaration ISO MPO”) consistent with the proposed redacted exhibits identified in the Wheeler Declaration.
- 12. Exhibits E-J to the Hutnyan Declaration ISO MPO in their entirety.
- 13. Samsung’s Motion for a Protective Order to the extent it refers to the above-referenced exhibits or confidential information therefrom.

The remainder of the documents at issue in Samsung’s Administrative Motion to File Under Seal [Dkt. No. 602] shall not be filed under seal.

**IT IS SO ORDERED.**

Dated: January \_\_\_\_\_, 2012.

---

HONORABLE PAUL S. GREWAL  
United States Magistrate Judge