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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 Exhibit 4 to the Declaration of Todd Briggs in Support of Samsung's Motion to Supplement Invalidity Contentions.

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 document discussES or contain information that has been

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

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

- 5 1. Exhibit 4 to the Declaration of Todd Briggs in Support of Samsung’s Motion to  
6 Supplement Invalidity Contentions.

7 **IT IS SO ORDERED.**

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9 DATED: \_\_\_\_\_

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HONORABLE LUCY H. KOH  
United States District Court Judge

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