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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 Samsung's Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung Executives.

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. The declaration establishes that the below documents discuss or contain information that has been designated as HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY by Samsung.

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

- 1. The confidential, unredacted version of Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung Executives;
- 2. Exhibits A, B, and E to M to the Declaration of Rachel Herrick Kassabian in Support of Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung Executives;
- 3. The Declarations of Gee Sung Choi, Jong Hyun Shin, Dale Sohn, Joseph Cheong, Seunghwan Cho, WonPyo Hong, Heonbae Kim, and Dong Jin Koh in Support of Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung Executives; and
- 4. The Declaration of Samuel Lee in Support of Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung Executives.

IT IS SO ORDERED.

DATED: _____

HONORABLE PAUL S. GREWAL
United States Magistrate Judge