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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 Opposition to Apple's Motion to Compel Apex Witnesses ("Opposition").

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 commercially sensitive business information that could be used by Samsung's competitors to Samsung's disadvantage.

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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 to File Documents Under Seal relating to Samsung’s Opposition to Apple’s Motion to Compel Apex Witnesses; and
2. The confidential, unredacted version of the Declaration of Joby Martin in Support of Samsung’s Opposition to Apple’s Motion to Compel Apex Witnesses.

**IT IS SO ORDERED.**

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

\_\_\_\_\_  
HONORABLE PAUL S. GREWAL  
United States Magistrate Judge