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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  
APPLE’S ADMINISTRATIVE MOTION  
TO FILE DOCUMENTS UNDER SEAL**

Apple, Inc. ("Apple") has filed an Administrative Motion to File Documents Under Seal (Dkt. No. 759). Pursuant to Civil L.R. 79-5(d), Apple moved to seal certain documents and information designated as "HIGHLY CONFIDENTIAL—ATTORNEYS EYES ONLY" by defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively "Samsung").

Samsung has filed the declaration required under Civil L.R. 79-5(d) and General Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The declaration

1 establishes that information contained in the below documents has been designated as HIGHLY  
2 CONFIDENTIAL – ATTORNEY’S EYES ONLY by Samsung.

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

- 5 • The confidential, unredacted version of Apple’s Rule 37(b)(2) Motion re Samsung’s  
6 Alleged Violation of January 27, 2012 Damages Discovery Order ("Apple's Rule  
7 37(b)(2) Motion");
- 8 • The confidential, unredacted version of the Declaration of Erik Olson In Support of  
9 Apple’s Rule 37(b)(2) Motion (“Olson Declaration”);
- 10 • The confidential, unredacted version of the Declaration of Eric Roberts In Support of  
11 Apple’s Rule 37(b)(2) Motion (“Roberts Declaration”);
- 12 • Exhibits 6, 9, 10 and 15 –19 to the Olson Declaration; and
- 13 • Exhibits A–F to the Roberts Declaration.

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15 **IT IS SO ORDERED.**

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17 DATED: March \_\_\_\_\_, 2012

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Hon. Paul S. Grewal  
United States Magistrate Judge

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