

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

3 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK-PSG

4 Plaintiff,

5 vs.

**[PROPOSED] ORDER GRANTING
SAMSUNG'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**6 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
7 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
8 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,9 Defendants.
1011
12 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
13 Telecommunications America, LLC (collectively, "Samsung") have filed Samsung's Motion to
14 Strike Expert Testimony Based on Undisclosed Facts and Theories.15 Samsung has filed the declaration required under Civil L.R. 79-5 and General
16 Order No. 62 to provide evidence of good cause for this Court to permit filing under seal. The
17 declaration establishes that the below documents contain information that has been designated as
18 **HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY** by Samsung.19 Accordingly, for good cause shown, the Court **ORDERS** that the following documents
20 shall be filed under seal:

- 21 1. The confidential, unredacted version of Samsung's Motion to Strike Expert
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- 22 Testimony Based on Undisclosed Facts and Theories ("Samsung's Motion to
-
- 23 Strike");
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- 24 2. Exhibits E, H, K, L, M, O, R, T, U, V, and X attached to the Declaration of James
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- 25 J. Ward in Support of Samsung's Motion to Strike; and
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- 26 3. The confidential, unredacted version of the Declaration of Christopher E. Price in
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- 27 Support of Samsung's Motion to Strike, and Exhibits B-GG thereto.
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IT IS SO ORDERED.

DATED: May ____, 2011

Honorable Paul S. Grewal
United States Magistrate Judge