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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendants.

Case No. 11-cv-01846-LHK

**[PROPOSED] ORDER GRANTING
SAMSUNG'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE SAMSUNG'S
MOTION TO EXCLUDE OPINIONS
OF CERTAIN APPLE EXPERTS**

1 Defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and
2 Samsung Telecommunications America, LLC (collectively, “Samsung”) filed Samsung’s
3 Administrative Motion to File Documents Under Seal on May 17, 2012 (D.N. 927) in support of
4 Samsung’s Motion to Exclude Opinions of Certain Apple Experts (“Motion to Exclude”).
5 Pursuant to Civil L.R. 79-5(d), Samsung moved to seal certain documents designated as
6 “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY” by
7 plaintiff Apple Inc. (“Apple”) under the protective order for the Northern District of California.
8 Also pursuant to Civil L.R. 79-5(d), for the purpose of establishing that the designated
9 information is sealable, Apple filed the Declaration of Cyndi Wheeler in Support of Sealing
10 Samsung’s Motion to Exclude (“Wheeler Declaration”) and the Declaration of Mark D. Selwyn
11 in Support of Sealing Samsung’s Motion to Exclude (“Selwyn Declaration”). The Wheeler and
12 Selwyn Declarations provide sufficient evidence that the documents and information designated
13 as confidential by Apple, and filed under seal by Samsung, are “privileged or protectable as a
14 trade secret or otherwise entitled to protection under the law,” and thus sealable. Civil L.R. 79-
15 5(a).

16 Accordingly, IT IS HEREBY ORDERED that the following documents shall be filed
17 under seal, as and to the extent described in the Wheeler and Selwyn Declarations:

- 18 • Exhibits 1-8, 10-12, 15, 18, 26-27, 32, and 34 to the Declaration of Joby Martin in
19 Support of Samsung’s Motion to Exclude Opinions of Certain Apple Experts.
- 20 • The confidential, unredacted versions of Samsung’s Motion to Exclude Opinions of
21 Certain Apple Experts and the Declaration of Joby Martin in Support of Samsung’s
22 Motion to Exclude Opinions of Certain Apple Experts, which includes information from
23 the documents discussed above.
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IT IS SO ORDERED.

Dated: _____

Hon. Lucy H. Koh
United States District Judge