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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 (PSG)

**[PROPOSED] ORDER GRANTING
SAMSUNG'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE SAMSUNG'S
MOTION TO ENFORCE**

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 22, 2012 (Dkt. No. 965) relating to
4 Samsung’s Motion to Enforce April 12, 2012 Order (“Motion to Enforce”). Pursuant to Civil L.R.
5 79-5(d), Samsung moved to seal certain deposition transcripts designated as “HIGHLY
6 CONFIDENTIAL ATTORNEYS’ EYES ONLY” under the protective order in this case and
7 protective orders in various other cases, including ITC investigations. Pursuant to Civil L.R. 79-
8 5(d), for the purpose of establishing that the designated information is sealable, Apple filed the
9 Declaration of Cyndi Wheeler in Support of Sealing Samsung’s Motion to Enforce (“Wheeler
10 Declaration”). The Wheeler Declaration provides sufficient evidence that the documents and
11 information designated as confidential by Apple, and filed under seal by Samsung, are “privileged
12 or protectable as a trade secret or otherwise entitled to protection under the law,” and thus
13 sealable. Civil L.R. 79-5(a).

14 Accordingly, IT IS HEREBY ORDERED that the following documents shall be filed
15 under seal:

- 16 • Exhibits 12-22 to the Declaration of Diane C. Hutnyan in Support of Samsung’s Motion
17 to Enforce;
- 18 • The confidential, unredacted versions of Samsung’s Motion to Enforce, which includes
19 information from the documents discussed above.
20

21
22 **IT IS SO ORDERED.**

23
24 Dated: _____

Hon. Paul S. Grewal
United States Magistrate Judge