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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,

Defendant.

CASE NO. 11-cv-01846-LHK

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

1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Samsung
2 Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC (collectively, “Samsung”) move for an order to seal the following documents:

- 4 1. The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion
5 for Adverse Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 6 2. The confidential, unredacted version of the Declaration of Hankil Kang in Support
7 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
8 to Samsung’s Spoliation of Evidence;
- 9 3. The confidential, unredacted version of the Declaration of Byungil Kim in Support
10 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
11 to Samsung’s Spoliation of Evidence;
- 12 4. The confidential, unredacted version of the Declaration of Young-jo Lim in
13 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
14 Instructions Due to Samsung’s Spoliation of Evidence;
- 15 5. The confidential, unredacted version of the Declaration of Giho Ro in Support of
16 Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to
17 Samsung’s Spoliation of Evidence;
- 18 6. The confidential, unredacted version of the Declaration of Han-Yeol Ryu in
19 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
20 Instructions Due to Samsung’s Spoliation of Evidence;
- 21 7. The confidential, unredacted version of the Declaration of Heontae Son in Support
22 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
23 to Samsung’s Spoliation of Evidence;
- 24 8. The confidential, unredacted version of the Declaration of Se-Hyun Cho in Support
25 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
26 to Samsung’s Spoliation of Evidence;

- 1 9. The confidential, unredacted version of the Declaration of Nara Cho in Support of
2 Opposition to Apple Inc.'s Motion for Adverse Inference Jury Instructions Due to
3 Samsung's Spoliation of Evidence;
- 4 10. The confidential, unredacted version of the Declaration of Michael Finnegan in
5 Support of Opposition to Apple Inc.'s Motion for Adverse Inference Jury
6 Instructions Due to Samsung's Spoliation of Evidence;
- 7 11. The confidential, unredacted version of the Declaration of Woo-up Kwon in
8 Support of Opposition to Apple Inc.'s Motion for Adverse Inference Jury
9 Instructions Due to Samsung's Spoliation of Evidence;
- 10 12. The confidential, unredacted version of the Declaration of Ioi Lam in Support of
11 Opposition to Apple Inc.'s Motion for Adverse Inference Jury Instructions Due to
12 Samsung's Spoliation of Evidence;
- 13 13. The confidential, unredacted version of the Declaration of Don Joo Lee in Support
14 of Opposition to Apple Inc.'s Motion for Adverse Inference Jury Instructions Due
15 to Samsung's Spoliation of Evidence;
- 16 14. The confidential, unredacted version of the Declaration of Kang Hyun Lee in
17 Support of Opposition to Apple Inc.'s Motion for Adverse Inference Jury
18 Instructions Due to Samsung's Spoliation of Evidence;
- 19 15. The confidential, unredacted version of the Declaration of Kyu Hyuk Lee in
20 Support of Opposition to Apple Inc.'s Motion for Adverse Inference Jury
21 Instructions Due to Samsung's Spoliation of Evidence;
- 22 16. The confidential, unredacted version of the Declaration of Minhyouk Lee in
23 Support of Opposition to Apple Inc.'s Motion for Adverse Inference Jury
24 Instructions Due to Samsung's Spoliation of Evidence;
- 25 17. The confidential, unredacted version of the Declaration of Sungsik Lee in Support
26 of Opposition to Apple Inc.'s Motion for Adverse Inference Jury Instructions Due
27 to Samsung's Spoliation of Evidence;
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- 1 18. The confidential, unredacted version of the Declaration of Min Cheol Schin in
2 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
3 Instructions Due to Samsung’s Spoliation of Evidence;
- 4 19. The confidential, unredacted version of the Declaration of YoungSoon Lee in
5 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
6 Instructions Due to Samsung’s Spoliation of Evidence;
- 7 20. The confidential, unredacted version of the Declaration of Jong-Dae Park in
8 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
9 Instructions Due to Samsung’s Spoliation of Evidence;
- 10 21. The confidential, unredacted version of the Declaration of M. James Daley in
11 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
12 Instructions Due to Samsung’s Spoliation of Evidence;
- 13 22. The confidential, unredacted version of the Declaration of Joo Hyuk Kang in
14 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
15 Instructions Due to Samsung’s Spoliation of Evidence;
- 16 23. The confidential, unredacted version of the Declaration of Won Pyo Hong in
17 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury
18 Instructions Due to Samsung’s Spoliation of Evidence;
- 19 24. The confidential, unredacted version of the Declaration of Alex Binder in Support
20 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
21 to Samsung’s Spoliation of Evidence (“the Binder Declaration”);
- 22 25. Exhibits 1-3 to the Binder Declaration;
- 23 26. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
24 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due
25 to Samsung’s Spoliation of Evidence; and
- 26 27. Exhibits 1, 4-30, 32, and 33 to the Declaration of Thomas Watson in Support of
27 Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to
28 Samsung’s Spoliation of Evidence.

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Having considered the arguments of the parties and the papers submitted, and GOOD CAUSE HAVING BEEN SHOWN, the Court hereby GRANTS Samsung's Administrative Motion to File Under Seal.

IT IS SO ORDERED.

Dated:

By: _____
Honorable Lucy H. Koh
United States District Court Judge