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

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung  
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung's  
Administrative Motion to File Documents Under Seal, in connection with Samsung's Opposition  
to Apple Inc.’s (Apple’s) Motion to Exclude Testimony of Samsung’s Experts and Samsung’s  
Opposition to Apple’s Motion to Strike Portions of Samsung’s Expert Reports.

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

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

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

- 5 1. The confidential, unredacted version of Samsung's Opposition to Apple's Motion to  
6 Exclude Testimony of Samsung's Experts;
- 7 2. Exhibits D -G, I, N, O and Q to the Declaration of Joby Martin in Support of the  
8 Opposition to Exclude Testimony of Samsung's Experts;
- 9 3. The confidential, unredacted version of Samsung's Opposition to Apple's Motion to  
10 Strike Portions of Samsung's Expert Reports;
- 11 4. Exhibits B - D, G - M, P, Q, S - U, X, Y, BB, DD - FF to the Declaration of James  
12 Ward in Support of the Opposition to Apple's Motion to Strike Portions of  
13 Samsung's Expert Reports ("Ward Declaration"); and
- 14 5. Exhibits 1, 3-9, 12-17 and 20 to the Declaration of Joby Martin in Support of the  
15 Opposition to Apple's Motion to Strike Portions of Samsung's Expert Reports.

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17 **IT IS SO ORDERED.**

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19 DATED: \_\_\_\_\_, 2012

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Hon. Lucy H. Koh  
United States District Judge

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