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11 *Attorneys for Plaintiff and Counterclaim-Defendant Apple Inc.*

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 APPLE INC., a California corporation, 16 Plaintiff, 17 v. 18 SAMSUNG ELECTRONICS CO., LTD., a Korean corporation; SAMSUNG 19 ELECTRONICS AMERICA, INC., a New York corporation; and SAMSUNG 20 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, 21 Defendants. 22 SAMSUNG ELECTRONICS CO., LTD., a Korean corporation; SAMSUNG 23 ELECTRONICS AMERICA, INC., a New York corporation, and SAMSUNG 24 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, 25 Counterclaim-Plaintiff, 26 v. 27 APPLE INC., a California corporation, 28 Counterclaim-Defendant.

CASE NO. 12-cv-00630-LHK (PSG)

**[PROPOSED] ORDER SEALING EXHIBITS B,
 C, D AND F TO THE DECLARATION OF
 SCOTT L. WATSON IN SUPPORT OF
 SAMSUNG'S OPPOSITION TO APPLE'S
 MOTION FOR PRELIMINARY INJUNCTION**

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Samsung Electronics Co. Ltd.,
2 Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively,
3 “Samsung”) filed Samsung’s Administrative Motion to File Under Seal on June 1, 2012 in support of
4 Samsung’s Declaration of Scott L. Watson In Support Of Samsung’s Opposition to Apple’s Motion
5 For Preliminary Injunction (the “Watson Declaration”). Pursuant to Civil L.R. 79-5(d), Samsung
6 moved to seal Exhibits B, C, D and F to the Watson Declaration on the grounds that it contained
7 information designated as “CONFIDENTIAL” and “HIGHLY CONFIDENTIAL – ATTORNEYS’
8 EYES ONLY” by plaintiff Apple Inc. (“Apple”) under the Protective Order applicable in this
9 litigation.

10 Pursuant to Civil Local Rule 79-5(d), Apple has filed the declaration of Cyndi Wheeler
11 regarding Samsung’s Administrative Motion to File Documents Under Seal (Declaration of Scott L.
12 Watson In Support of Samsung’s Opposition to Apple’s Motion For Preliminary Injunction) (the
13 “Wheeler Declaration”). The Wheeler Declaration provides sufficient evidence that the information
14 designated as confidential by Apple and contained within Exhibits B, C, D, and F are “privileged or
15 protectable as trade secret otherwise entitled to protection under the law,” and thus sealable. Civil
16 L.R. 79-5(a). By filing of the Wheeler Declaration, Apple thus has filed the declaration required
17 under Civil L.R. 79-5 and General Order No. 62, which provides evidence of good cause for this
18 Court to permit filing under seal.

19 Having considered the motion and declaration cited therein, and finding good cause therefore,
20 the Court hereby GRANTS Samsung’s motion to file under seal. Accordingly, IT IS HEREBY
21 ORDERED that the confidential, unredacted version of Exhibits B, C, D and F to the Declaration of
22 Scott L. Watson In Support of Samsung’s Opposition to Apple’s Motion for Preliminary Injunction
23 shall be filed under seal.

24 **IT IS SO ORDERED.**

25
26 Dated: _____, 2012

By: _____
HONORABLE LUCY H. KOH
UNITED STATES DISTRICT JUDGE