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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

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

1 Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
2 Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s
3 Administrative Motion to File Documents Under Seal.

4 Samsung has filed the declaration required under Civil L.R. 79-5 and General Order No.
5 62 to provide evidence of good cause for this Court to permit filing under seal. The declaration
6 establishes that portions of Samsung’s Opposition to Apple’s Motion For Leave to File a Surreply
7 to Samsung’s Motion For New Trial Or, Alternatively, For Entry of Judgment (“Opposition to
8 Motion For Leave”) contain, discuss, or refer to Samsung’s non-public, confidential source code.

9
10 Accordingly, for good cause shown, the Court HEREBY ORDERS that portions of
11 Samsung’s Opposition to Motion For Leave may be filed under seal.

12
13 DATED: _____

The Honorable Lucy H. Koh
United States District Court Judge