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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 TEMPORARY SEAL UNTIL THE JURY COMPLETES ITS DELIBERATIONS

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s Proffer of Witness Testimony and Exhibits.

Samsung has 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 declaration establishes that the below documents contain information that the Court granted the parties permission to file under seal.

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

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1. Samsung's Proffer of Witness Testimony and Exhibits;
2. The Declaration of Diane Hutnyan in Support of Samsung's Proffer of Witness Testimony and Exhibits; and
3. The Declaration of Brett Arnold in Support of Samsung's Proffer of Witness Testimony and Exhibits.

IT IS SO ORDERED.

DATED: _____, 2012

Honorable Lucy H. Koh
United States District Judge