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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 Proffer of
Witness Testimony and Exhibits

Apple Inc. (“Apple”) and Samsung have filed the declarations required under Civil L.R.
79-5 and General Order No. 62 to provide evidence of compelling reasons for this Court to permit
filing under seal. The declarations establish that the below documents contain information that
has been designated by the parties as **HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
ONLY.**

1 Accordingly, for compelling reasons shown, the Court ORDERS that the following shall
2 be filed under seal:

- 3 1. Exhibit 2 to the Declaration of Diane Hutnyan in Support of Samsung's Proffer of
4 Witness Testimony and Exhibits; and
5 2. Exhibits A, Q, S, and T to the Declaration of Brett Arnold in Support of Samsung's
6 Proffer of Witness Testimony and Exhibits.

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8 **IT IS SO ORDERED.**

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10 DATED: _____, 2012

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Honorable Lucy H. Koh
United States District Judge

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