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7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 APPLE, INC., a California Corporation,) Case No. 11-CV-01846-LHK
12)

12 Plaintiff,)

13 vs.)

14 SAMSUNG ELECTRONICS CO., LTD.,)
a Korean corporation; SAMSUNG)
15 ELECTRONICS AMERICA, INC., a)
New York corporation; SAMSUNG)
16 TELECOMMUNICATIONS AMERICA,)
LLC, a Delaware limited liability)
17 company,)

18 Defendants.)
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**[PROPOSED] ORDER TO SEAL
EXCERPTS OF PLAINTIFF'S
EXHIBITS 87 AND 2065**

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1 Samsung has moved the Court to seal portions of certain documents, including excerpts from
2 Plaintiff’s Exhibits 87 and 2065, which contain information of non-party Telefonaktiebolaget LM
3 Ericsson (“Ericsson”). Pursuant to Civil Local Rule 79-5(d) of this Court, Ericsson filed the
4 declarations of Mr. Reichman and Ms. Johns to establish that certain confidential, trade secret
5 information in each exhibit should be sealed and submitted a proposed order addressing Exhibits 87
6 and 2065. The Court has considered Ericsson’s declarations and the other papers in this cause and
7 finds that Ericsson has established compelling reasons to seal and redact the information requested.
8 Accordingly, the Court hereby Orders:

9 1. That all or portions of paragraphs 3, 4, 5, 10, 11, 12, 16, 21, 27, and 28, and Table 2
10 of Plaintiff’s Exhibit 87, “2nd Expert Report on Ericsson’s Cross-License Offer to Samsung,” be
11 redacted as shown in Exhibit B to the Declaration of Mr. Reichman, that Plaintiff’s Exhibit 87 in its
12 entirety be sealed, and that only Plaintiff’s Exhibit 87 as redacted, pursuant to this Order, be made
13 available to the public.

14 2. That lines 20 through 24 of page 254 of Plaintiff’s Exhibit 2065, the transcript of the
15 deposition of Karl Heinz Rosenbrock, be redacted as shown in Exhibit C to the Declaration of Mr.
16 Reichman, that Plaintiff’s Exhibit 2065 in its entirety be sealed, and that only Plaintiff’s Exhibit
17 2065 as redacted, pursuant to this Order, be made available to the public.

18 **IT IS SO ORDERED.**

19 Dated: October ____, 2012

LUCY H. KOH
United States District Judge

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