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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 and Apple have each filed the declarations required under Civil L.R. 79-5 and
5 General Order No. 62 to provide evidence of good cause for this Court to permit filing under seal.
6 The declarations establish that Exhibit 6 to the Declaration of Robert J. Becher in Support of
7 Samsung's Motion for New Trial Regarding '381 Patent Pursuant to Fed. R. Civ. P. 59 Based on
8 Newly Discovered Evidence or, Alternatively, for Entry of Judgment on Liability ("Becher
9 Declaration"), Portions of the Declaration of Andries van Dam, Ph.D. in Support of Samsung's
10 Motion for New Trial Regarding '381 Patent Pursuant to Federal Rule of Civil Procedure 59
11 Based on Newly Discovered Evidence ("van Dam Declaration"), and Portions of Samsung's
12 Notice of Motion and Motion for New Trial Regarding '381 Patent Pursuant to Fed. R. Civ. P. 59
13 Based on Newly Discovered Evidence or, Alternatively, for Entry of Judgment on Liability
14 ("Motion") contain Samsung's and third parties' non-public, confidential source code and Apple's
15 non-public, confidential information.

16
17 Accordingly, for good cause shown, the Court HEREBY ORDERS that Exhibit 6 to the
18 Becher Declaration, portions of the van Dam Declaration and portions of Samsung's Motion may
19 be filed under seal.

20
21 DATED: _____

The Honorable Lucy H. Koh
United States District Court Judge