

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 RENEWED
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 Renewed
Administrative Motion to File Documents Under Seal.

Third parties Intel, Ericsson, and MicroSoft 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 good cause and compelling reasons shown, the Court ORDERS that the
2 following shall be filed under seal:

- 3 1. Excerpts from Exhibit 87 to Samsung's Notice of Filing of Excluded Exhibits,
4 containing Samsung's Demonstratives 3966.104, 3966.105, 3966.106, 3966.107,
5 and 3966.108 (ECF 1898);
- 6 2. Excerpts from Exhibit FF of the Hutnyan Declaration containing excerpts from the
7 Rebuttal Expert Report of Hyong S. Kim, Ph.D., Regarding Non-Infringement of
8 the Asserted Claims of U.S. Patent No. 7,447,516, dated April 16, 2012 (ECF
9 1682-05);
- 10 3. Excerpts from PX 87, the Second Expert Report on Ericsson's Cross-License Offer
11 to Samsung, prepared for Brinkhof Advocaten by Hillebrand & Partners Consulting
12 Engineers;
- 13 4. Excerpts from PX 2065, excerpts from the deposition of Karl Heinz Rosenbrock,
14 dated April 20, 2012; and
- 15 5. Exhibit 10 to the Declaration of Curran M. Walker in Support of Samsung's
16 Objections and Responses Regarding Exhibits and Deposition Designations
17 Disclosed on August 15, 2012, containing excerpts of the May 16, 2012
18 deposition of Microsoft employee Bryan Agnetta (ECF 1781-24).

19
20 **IT IS SO ORDERED.**

21
22 DATED: _____, 2012

23
24
25 _____
26 Honorable Lucy H. Koh
27 United States District Judge