

1 Michael Liu Su (SBN 300590)  
michael.liu.su@finnegan.com  
2 FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP  
3 3300 Hillview Avenue  
Palo Alto, CA 94304  
4 Telephone: (650) 849-6600  
Facsimile: (650) 849-6666  
5

Lionel M. Lavenue (*pro hac vice*)  
6 lionel.lavenue@finnegan.com  
Bradford C. Schulz (*pro hac vice*)  
7 bradford.schulz@finnegan.com  
FINNEGAN, HENDERSON, FARABOW,  
8 GARRETT & DUNNER, LLP  
Two Freedom Square  
9 11955 Freedom Drive  
Reston, VA 20190  
10 Telephone: (571) 203-2700  
Facsimile: (202) 408-4400  
11

12 Attorneys for Plaintiff  
ZTE (USA) Inc.

13  
14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION  
17

18 ZTE (USA) INC.,  
19 Plaintiff,  
20 v.  
21 AGIS SOFTWARE DEVELOPMENT LLC,  
22 Defendant.

CASE NO. 4:18-cv-06185-HSG  
(Former Case No. 2:17-cv-00517-JRG)  
(E.D. Tex.)

**[PROPOSED] ORDER GRANTING  
ZTE (USA) INC.'s ADMINISTRATIVE  
MOTION FOR FILING UNDER SEAL**

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

**[PROPOSED] ORDER**

The Court, having reviewed ZTE (USA) Inc.’s Administrative Motion for Filing Under Seal and the Declaration of Bradford C. Schulz in Support of the Motion, and good cause appearing therefore, HEREBY ORDERS THAT:

The following documents shall be filed under seal:

- 1. The highlighted, unredacted version of ZTE’s Response to Motion to Dismiss Second Amended Complaint; Memorandum of Points and Authorities in Support;
- 2. The highlighted, unredacted version of the Declaration of Bradford C. Schulz in Support of ZTE’s Response to Motion to Dismiss Second Amended Complaint; and
- 3. Exhibits 3, 4, 5, 6, 8, 10, 14, and 34 to the Declaration of Bradford C. Schulz in Support of ZTE’s Response to Motion to Dismiss Second Amended Complaint, in their entirety.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Haywood S. Gilliam Jr.  
United States District Judge