Honorable John C. Coughenour 1 2 3 4 5 6 7 8 9 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 10 AT SEATTLE 11 STEVEN FLOYD, individually and on behalf of all other similarly situated, 12 Case No. 2:22-cv-01599 JCC 13 Plaintiff, [PROPOSED] ORDER GRANTING APPLE INC.'S MOTION TO SEAL 14 v. Noted for Hearing: February 24, 2023 15 AMAZON.COM INC. and APPLE INC., 16 Defendants. 17 The Court, having received and reviewed Apple Inc.'s Motion to Seal (the "Motion"), 18 HEREBY FINDS, CONCLUDES, and ORDERS that: 19 Apple Inc. has shown compelling reasons to seal the Global Tenets Agreement ("GTA") 20 attached as Exhibit A to its Motion to Dismiss and narrow portions of its Motion to Dismiss quot-21 ing the contents of the GTA. These materials contain confidential business information that, if 22 made public, could harm Apple Inc.'s competitive standing by providing Apple Inc.'s competi-23 tors and potential future business partners with information about the terms to which Apple Inc. 24 agreed in the GTA. 25 No means other than the sealing and redaction proposed by Apple Inc. will protect the 26 confidential business information in the GTA, the protection of which outweighs the public right 27 of access to court records. 28 Orrick Herrinaton & Sutcliffe LLP



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Apple Inc.'s Motion to Seal is therefore GRANTED. Exhibit A and the portion of its Motion to Dismiss quoting the contents of that exhibit previously filed under seal shall be maintained under seal.

Dated 24th day of February, 2023.

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT JUDGE



