

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L., )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. 13-919 (JLH)  
 )  
 GOOGLE LLC, )  
 )  
 Defendant. )

**STIPULATION AND ~~PROPOSED~~ ORDER ALLOWING NON-PARTIES SAMSUNG  
ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC. TO  
ACCESS TRIAL TRANSCRIPTS**

WHEREAS, a jury trial was held in this matter from April 24 to May 2, 2023;

WHEREAS, non-parties Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) were advised that certain agreements between Arendi S.A.R.L. (“Arendi”) and Samsung were used as exhibits and discussed in a sealed courtroom during the jury trial;

WHEREAS, Samsung filed a Notice of Intent to Redact and/or Seal Limited Portions of the Trial Transcripts and Exhibits on June 8, 2023 (D.I. 564);

WHEREAS, under the relevant Third Circuit standard, which requires a party to show that disclosure of the material sought to be protected would cause a “clearly defined and serious injury,” *In re Avandia Marketing*, 924 F.3d 662, 672 (3d Cir. 2019), Samsung will need access to the trial transcripts to make an informed decision regarding the proper scope of the requested redactions;

WHEREAS, Samsung has agreed to accept copies of the transcript that have third party confidential information redacted, provided that Samsung will have full access to portions of the transcript that mention Samsung or its agreements, and provided that Samsung’s confidential information likewise will be redacted in any transcripts provided to any third party;

IT IS HEREBY STIPULATED AND AGREED, by and through the undersigned counsel for Plaintiff Arendi, Defendant Google LLC, and non-parties Samsung, subject to the approval of the Court, that Samsung's outside counsel shall be permitted to access the transcripts from the jury trial held from April 24, 2023 to May 2, 2023, which a party may redact to remove third party confidential information unrelated to Samsung or Samsung's agreements with Arendi.

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*Attorneys for Non-Parties Samsung Electronics  
Co., Ltd. and Samsung Electronics America,  
Inc.*

SO ORDERED this 22nd day of June, 2023



The Honorable Jennifer L. Hall  
United States Magistrate Judge