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25 *Philips North America LLC*

26 **UNITED STATES DISTRICT COURT**
27 **CENTRAL DISTRICT OF CALIFORNIA**
28 **WESTERN DIVISION**

Philips North America LLC,

Plaintiff,

v.

Garmin International, Inc.
and Garmin Ltd.,

Defendants.

Case No. 2:19-cv-06301-AB-KS

Discovery Matter

Magistrate Judge Karen E. Scott

**JOINT STIPULATION FOR ENTRY
OF PROTECTIVE ORDER AND
ELECTRONIC DISCOVERY ORDER**

1 Plaintiff Philips North America LLC (“Philips”) and Defendants Garmin
2 International, Inc. and Garmin Ltd. (collectively, “Garmin”) hereby jointly and respectfully
3 stipulate to the Court’s entry of the attached proposed Protective Order and proposed
4 Electronic Discovery Order. Philips and Garmin are currently engaged in parallel litigation
5 in the International Trade Commission regarding related subject matter, and have already
6 been operating under agreed discovery terms in that litigation. The attached proposed
7 orders mirror the terms the parties have already been following, and thereby create
8 significant efficiencies for them in continuing to follow those terms universally, rather than
9 having two different sets of procedures in the parallel cases, which could cause unnecessary
10 confusion and expense. The parties therefore respectfully request entry of the attached
11 proposed discovery orders.

12
13 Dated: May 26, 2020

Respectfully submitted,

14 **LAMKIN IP DEFENSE**

FOLEY & LARDNER LLP

15 /s/ Rachael D. Lamkin

/s/ Jean-Paul Ciardullo

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I certify that Rachael D. Lamkin and Michelle L. Marriott authorized the electronic filing of this document.

/s/ Jean-Paul Ciardullo