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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 L. Stevenson

**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.

5 The attached proposed Protective Order has now been amended to include a Good
6 Cause Statement per the Court’s Order at Dkt. 68. The Good Cause Statement has
7 been taken directly from the Magistrate Judge’s proposed form protective order. The
8 Parties have been engaged in numerous issues over the past several days, and so
9 respectfully request leave of the Court to have filed this supplementation early in the
10 morning of June 4 well before the opening of business, rather than on June 3.

11 Philips and Garmin are currently engaged in parallel litigation in the International
12 Trade Commission regarding related subject matter, and have already been operating under
13 agreed discovery terms in that litigation. The attached proposed orders mirror the terms the
14 parties have already been following, and thereby create significant efficiencies for them in
15 continuing to follow those terms universally, rather than having two different sets of
16 procedures in the parallel cases, which could cause unnecessary confusion and expense.
17 The parties therefore respectfully request entry of the attached proposed discovery orders.

18
19 Dated: June 4, 2020

Respectfully submitted,

20 **LAMKIN IP DEFENSE**

FOLEY & LARDNER LLP

21 /s/ Rachael D. Lamkin

/s/ Jean-Paul Ciardullo

22 Rachael D. Lamkin (246066)

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11 I certify that Rachael D. Lamkin authorized the electronic filing of this document.

12 /s/ Jean-Paul Ciardullo
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