

1 **NOTE CHANGES MADE BY COURT**

2
3 **UNITED STATES DISTRICT COURT**
4 **CENTRAL DISTRICT OF CALIFORNIA**

5
6 LIMESTONE MEMORY SYSTEMS LLC,

7 Plaintiff,

Case No.: 8:15-cv-00278-DOC-KES

8 v.

9 MICRON TECHNOLOGY, INC., AND
10 MICRON MEMORY JAPAN, INC.

**PROPOSED STIPULATED PROTECTIVE
ORDER**

11 Defendants.

12 LIMESTONE MEMORY SYSTEMS LLC,

13 Plaintiff,

Case No.: 8:15-cv-00648-DOC-KES

14 v.

15 DELL INC.,

16 Defendant.

17 LIMESTONE MEMORY SYSTEMS LLC,

18 Plaintiff,

Case No.: 8:15-cv-00650-DOC-KES

19 v.

20 LENOVO (UNITED STATES) INC.

21 Defendant.

22 LIMESTONE MEMORY SYSTEMS LLC,

23 Plaintiff,

Case No.: 8:15-cv-00652-DOC-KES

24 v.

25 HEWLETT-PACKARD COMPANY,

26 Defendant.
27
28

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

LIMESTONE MEMORY SYSTEMS LLC, Plaintiff, ACER AMERICA CORPORATION. Defendant.
LIMESTONE MEMORY SYSTEMS LLC, Plaintiff, KINGSTON TECHNOLOGY Co., INC. Defendant.
LIMESTONE MEMORY SYSTEMS LLC, Plaintiff, OCZ STORAGE SOLUTIONS, INC. Defendant.

Case No.: 8:15-cv-00653-DOC-KES

Case No.: 8:15-cv-00654-DOC-KES

Case No.: 8:15-cv-00658-DOC-KES

TABLE OF CONTENTS

1				Page
2				
3	I.	DEFINITIONS		2
4	II.	TERMS AND CONDITIONS		6
5		A. General Limitations On Disclosure And Use Of Designated		
6		Material		6
7		B. Procedure For Designating Materials		7
8		C. Inadvertent Production		9
9		D. Material Not Covered By This Protective Order		11
10		E. Challenges To Designations		11
11		F. Inspection Of Materials.....		13
12		G. Access To CONFIDENTIAL Material.....		13
13		H. Access To HIGHLY CONFIDENTIAL Material		14
14		I. Access to RESTRICTED CONFIDENTIAL - OUTSIDE		
15		COUNSEL’S EYES ONLY Material		15
16		J. Access to Circuit Schematic Files.....		21
17		K. Notice of Disclosure.....		22
18		L. Disclosure of Designated Materials To Other Parties in the		
19		Litigation		24
20		M. Exceptions To Limitations On Disclosure.....		25
21		N. Use At Depositions		26
22		O. Prosecution and Acquisition Bar		27
23		P. Stipulations Or Additional Relief From The Court		27
24		Q. Return Of Designated Material		28
25		R. Injunctive Relief.....		28
26		S. Survival Of Order.....		29
27		T. Treatment Prior To Entry Of Protective Order		29
28				

1	U. Protected Material Subpoenaed Or Ordered Produced In Other	
2	Litigation	29
3	V. Other Proceedings	30
4	W. Computation of Time	30
5	X. Filing Designated Material	30
6	Y. Burden of Proof.....	31
7	Z. Discovery Rules Remain Unchanged	31
8	AA. Use at Trial.....	32
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

STIPULATED PROTECTIVE ORDER

1 Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff
2 Limestone Memory Systems LLC (“Plaintiff”), and Defendants Micron Technology,
3 Inc. (“MTI”), ~~Micron Memory Japan, Inc. (“MMJ”),¹~~ Dell Inc., Hewlett-Packard
4 Company, Kingston Technology Company, Inc., OCZ Storage Solutions, Inc., Acer
5 America Corporation, and Lenovo (United States) Inc. (collectively, “the Parties”)
6 have stipulated and agreed to the terms and entry of, and the Court hereby orders the
7 Parties to abide by, this Protective Order. This Protective Order is issued to facilitate
8 document disclosure and production under the Local Rules of this Court and the
9 Federal Rules of Civil Procedure. Information subject to this Protective Order may
10 be used only for the purposes of a lawsuit governed by this Protective Order. Unless
11 modified pursuant to the terms contained in this Protective Order or by a subsequent
12 Protective Order, this Protective Order shall remain in effect through the conclusion
13 of each lawsuit governed by this Protective Order.
14

15 In support of this Order, the Parties allege that this action may involve trade
16 secrets and other valuable commercial, financial, technical and/or proprietary
17 information for which special protection from public disclosure and from use for any
18 purpose other than prosecuting this action is warranted. Accordingly, to expedite the
19 flow of information, to facilitate the prompt resolution of disputes over confidentiality
20 of discovery Materials, to adequately protect information the Parties are entitled to
21 keep confidential, and to ensure that the Parties are permitted reasonably necessary
22 uses of such Materials in preparation for and in the conduct of trial, pursuant to
23 Federal Rule of Civil Procedure 26(c), and for good cause shown,

24 IT IS HEREBY ORDERED THAT:

25
26 ¹ ~~MMJ’s response to Plaintiff’s Second Amended Complaint is not due until July 5,~~
27 ~~2018. MMJ’s agreement to abide by the terms of this Protective Order is without~~
28 ~~waiver of any defenses, including any defenses under Fed. R. Civ. P. 12(b). All such~~
~~defenses are reserved.~~

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.