

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNIVERSITY OF MASSACHUSETTS and
CARMEL LABORATORIES, LLC,

Plaintiffs,

v.

L'ORÉAL USA, INC.,

Defendant.

Case No. 17-cv-868-CFC-SRF

[PROPOSED] ORDER

THIS MATTER having been brought before the Court on Motion by Plaintiffs University of Massachusetts and Carmel Laboratories, LLC, seeking production of certain development records for the Accused Products; certain documents related to Defendant's patent applications; and organizational charts reflecting the structure of Defendant's business and personnel; and the Court having considered the parties' positions as set forth in the letters submitted on April 20 and 22, 2020, and during the April 24, 2020 hearing;

IT IS on this _____ day of April, 2020, hereby:

ORDERED that Plaintiffs' Motion is hereby GRANTED;

ORDERED that Defendant shall produce all documents related to the inclusion of adenosine in each of the Accused Products, no later than May 1, 2020;

ORDERED that Defendant shall produce all documents related to the Accused Products effect on wrinkling, roughness, dryness, or laxity of the skin, no later than May 1, 2020;

ORDERED that Defendant shall supplement its response to Plaintiffs' Interrogatory No. 6 to provide a complete response, no later than May 1, 2020;

ORDERED that Defendant shall search the files of Marc Cornell, Isabelle Hansenne, Hani Fares, and Jean-Baptist Galey and produce all documents therein regarding the effect of adenosine on skin, and L'Oréal's knowledge of the asserted patents, no later than May 1, 2020; and

ORDERED that Defendant shall produce organizational charts and/or documents sufficient to show its organizational structure and the identity of its employees and the employees of its brands, no later than May 1, 2020.

Hon Sherry R. Fallon, U.S.M.J.