

EXHIBIT “A”

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

UNIVERSITY OF MASSACHUSETTS and)	
CARMEL LABORATORIES LLC,)	
)	
Plaintiffs,)	
)	C.A. No. 17-868-CFC-SRF
v.)	
)	
L'ORÉAL USA, INC.,)	
)	
Defendant.)	
)	
)	

[PROPOSED] ORDER

WHEREAS, Defendant L'Oréal USA, Inc. ("L'Oréal USA"), having moved the Court to compel Plaintiffs to supplement their responses to L'Oréal USA's Interrogatory Nos. 1, 8, 9, and 11;

WHEREAS, L'Oréal USA, having moved the Court to compel Plaintiffs to supplement and correct their privilege log and produce any non-privileged documents;

WHEREAS, L'Oréal USA, having moved the Court to compel Plaintiffs to produce documents relating to the Teresian Carmelites; and

WHEREAS, the Court having considered the Motion and any opposition thereto,

IT IS HEREBY ORDERED this ____ day of _____, 2020 that the Motion is **GRANTED**. Plaintiffs shall: (1) supplement their responses to L'Oréal USA's Interrogatory Nos. 1, 8, 9, and 11 to include all non-privileged factual information relating to the testing underlying Plaintiffs' infringement contentions and/or Plaintiffs' testing referenced in the 2015 and 2016 correspondence between the parties; (2) supplement their privilege log with descriptions that identify the specific litigation that forms the basis for Plaintiffs' work product claims and sufficient factual information for L'Oréal USA to assess Plaintiffs' privilege

assertions and/or produce any non-privileged documents; and (3) produce documents pertaining to the financial condition and outlays of the Teresian Carmelites since 2008 and documents pertaining to former Teresian Carmelites (and Carmel Labs) President Dennis Wyrzykowski's decision to separate from that organization.

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