

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HOSPIRA, INC.)	
)	
Plaintiff,)	C.A. Nos. 1:16-cv-00651
)	1:17-cv-07903
v.)	
)	Hon. Rebecca R. Pallmeyer
FRESENIUS KABI USA, LLC)	
)	
Defendant.)	

[PROPOSED] JOINT PRE-TRIAL ORDER

Pursuant to the Court’s Order (D.I. 98, Case No. 16-651), Plaintiff Hospira, Inc. and Defendant Fresenius Kabi USA, LLC (collectively, “the parties”) submit this Joint Pre-Trial Order. This Pre-Trial Order consists of the following sections:

Section	Description
I	Joint 1-page statement of issues
II	Procedure for trial exchanges
<i>Exhibit Lists¹</i>	
III-A	Joint Exhibit List (with the parties’ respective objections and objections key)
III-B	Hospira Exhibit List (with Fresenius Kabi objections)
III-C	Fresenius Kabi Exhibit List (with Hospira objections)

¹ The parties will continue to work to resolve objections to trial exhibits prior to their presentation at trial.

<i>Witness Lists</i>	
IV-A	Hospira Witness List
IV-B	Fresenius Kabi Witness List
<i>Deposition designations²</i>	
V-A	Hospira deposition designations (with Fresenius Kabi objections / counter-designations)
V-B	Fresenius Kabi deposition designations (with Hospira objections / counter-designations)
<i>Motions In Limine</i>	
VI-A-1	Fresenius Kabi's Motions <i>In Limine</i>
VI-A-2	Exhibits A-P to Fresenius Kabi's Motions <i>In Limine</i> (sealed)
VI-B-1	Hospira's Responses to Fresenius Kabi's Motions <i>In Limine</i>
VI-B-2	Exhibits A-D to Hospira's Responses to Fresenius Kabi's Motions <i>In Limine</i> (Exhibits A-C sealed)

² At the upcoming pre-trial conference, the parties will be prepared to discuss the Court's approach to playing deposition testimony at trial.

Dated: June 25, 2018

Respectfully submitted,

/s/ Bradford P. Lyerla

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CERTIFICATE OF SERVICE

I, Yusuf Esat, an attorney at the law firm of Jenner & Block LLP, hereby certify that on June 25, 2018, I caused a true and correct copy of the foregoing **JOINT PRE-TRIAL ORDER** to be electronically served on counsel of record via the Court's CM/ECF system. Exhibits filed under seal will be served via e-mail to counsel of record.

/s/ Yusuf Esat
Yusuf Esat