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

HOSPIRA, INC.

Plaintiff,

v.

C.A. Nos. 16-cv-0651 17-cv-7903

FRESENIUS KABI USA, LLC

Hon. Judge Rebecca R. Pallmeyer

Defendant.

## HOSPIRA'S MOTION TO SEAL EXHIBITS TO MOTIONS IN LIMINE BRIEFING

Pursuant to Local Rule 26.2, Plaintiff Hospira, Inc. ("Hospira") respectfully requests that the Court grant leave to file under seal the following portions of the parties' [Proposed] Joint Pre-Trial Order, which is filed contemporaneously herewith.

- Exhibits A-P to Fresenius Kabi's Motions In Limine; and
- Exhibits A-C to Hospira's Response to Fresenius Kabi's Motions *In Limine*.

A listing of each Exhibit is provided in Pre-Trial Order Exhibits VI-A-2 and VI-B-2. The materials contain confidential information produced during the litigation (confidential regulatory submission, license and supply agreement, and expert reports / deposition transcripts discussing such confidential materials). The information was provided subject to the Stipulated Protective Order entered by the Court. (D.I. 25.)

Hospira will provide the materials sought to be sealed to the Court as part of the courtesy copy of the Proposed Joint Pre-Trial Order. Hospira has also provided the materials to Fresenius Kabi.

Fresenius Kabi does not oppose Hospira's request to seal these materials.



Dated: June 25, 2018

Respectfully submitted,

By: <u>/s/ Bradford P. Lyerla</u>

Bradford P. Lyerla
Sara T. Horton
Aaron A. Barlow
Yusuf Esat
Ren-How Harn
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654-3456
(312) 222-9350
blyerla@jenner.com
shorton@jenner.com
abarlow@jenner.com
yesat@jenner.com
rharn@jenner.com

Attorneys for Plaintiff Hospira, Inc.



## **CERTIFICATE OF SERVICE**

I, Yusuf Esat, an attorney at the law firm of Jenner & Block LLP, certify that on June 25, 2018, the foregoing Hospira's Motion to Seal Exhibits to Motions *In Limine* Briefing was electronically served on counsel of record via the Court's CM/ECF system.

/s/ Yusuf Esat
Yusuf Esat

