

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

HOSPIRA, INC.

Plaintiff,

v.

FRESENIUS KABI USA, LLC

Defendant.

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

Hon. Judge Rebecca R. Pallmeyer

**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: /s/ Bradford P. Lyerla

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