

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

HOSPIRA, INC.,

Plaintiff,

v.

FRESENIUS KABI USA, LLC,

Defendant.

Civil Action Nos. 1:16-cv-00651
1:17-cv-07903

Hon. Judge Rebecca R. Pallmeyer

HOSPIRA’S MOTION TO SEAL ITS MOTION TO COMPEL

Plaintiff Hospira, Inc. (“Hospira”), respectfully requests, pursuant to Local Rules 5.8 and 26.2 and Local Patent Rule 1.4, that this Court grant leave to seal Hospira’s Motion To Compel Production Of Information Regarding Defendant’s Launch Timing And Effect For Use In Hospira’s Preliminary Injunction Brief, which is filed contemporaneously herewith. In support of its motion, Hospira states as follows:

1. On March 21, 2016, this Court entered a Stipulated Protective Order. (D.I. 25.)
2. The Stipulated Protective Order allows Confidential Information to be filed under seal. (D.I. 25 ¶2.)
3. The motion and the attached exhibits contain Confidential Information.
4. Hospira will provide the materials sought to be sealed to the Court for *in camera* review. Hospira will also provide the materials to Fresenius Kabi.

Hospira respectfully requests that this Court enter an order granting leave to file Hospira’s Motion To Compel Production Of Information Regarding Defendant’s Launch Timing And Effect For Use In Hospira’s Preliminary Injunction Brief under seal.

Dated: October 2, 2018

Respectfully submitted,

By: /s/ Bradford P. Lyerla

Bradford P. Lyerla
Sara T. Horton
Aaron A. Barlow
Yusuf Esat
Ren-How H. 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, Ren-How Harn, an attorney at the law firm of Jenner & Block LLP, certify that on October 2, 2018, the foregoing Hospira's Motion To Seal Its Motion To Compel was electronically served on counsel of record via the Court's CM/ECF system.

/s/ Ren-How Harn _____
Ren-How Harn