

**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.)	

JOINT MOTION TO ENTER STIPULATION

Plaintiff Hospira, Inc. and Defendant Fresenius Kabi USA, LLC (“the parties”)

respectfully request that the Court enter the attached Joint Stipulation (Exhibit A) regarding (1) filing the parties’ January 29, 2018 Stipulation under seal and (2) sealing the Transcript of Proceedings held on January 25, 2018 related to the January 29, 2018 Stipulation. Redacted versions of these documents are attached as Exhibits B-D. In support of this Motion, the parties state:

1. The parties entered a Stipulated Protective Order in the above-referenced matter on March 21, 2016 (D.I. 25, 1:16-cv-00651), modified on February 8, 2018 (D.I. 94, 1:16-cv-00651) and entered by the Court on February 12, 2018 (D.I. 96, 1:16-cv-00651), and which is currently in effect.
2. The Stipulated Protective Order allows Confidential Information, including non-public business plans and competitively sensitive business information, to be filed under seal. (D.I. 25, 1:16-cv-00651 at ¶¶ 2(d)(i), 12-13, 16.)

3. The January 29, 2018 Stipulation and Transcript of Proceedings held on January 25, 2018 contain Confidential Information relating to the date before which Fresenius Kabi will not launch its dexmedetomidine products which are the subject of this litigation.

WHEREFORE, the parties request that the Court enter the Stipulation attached as Exhibit

A.

Dated: May 3, 2018

Respectfully submitted,

/s/ Bradford P. Lyerla

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LLC*

CERTIFICATE OF SERVICE

I, Tara Kurtis, an attorney at the law firm of Schiff Hardin LLP, hereby certify that on May 3, 2018, I caused a true and correct copy of the foregoing JOINT MOTION TO ENTER STIPULATION to be electronically served on counsel of record via the Court's CM/ECF system.

/s/ Tara Kurtis

Tara Kurtis