

Exhibit A

**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 STIPULATION

This stipulation is made by and between Plaintiff Hospira, Inc. (“Hospira”) and Defendant Fresenius Kabi USA, LLC (“Fresenius Kabi”) (collectively, “the Parties”).

WHEREAS the Court entered a Stipulated Protective Order in the above-referenced matter on March 21, 2016 (D.I. 25, 1:16-cv-00651);

WHEREAS the Parties modified the Stipulated Protective Order on February 8, 2018 (D.I. 94, 1:16-cv-00651), which the Court entered on February 12, 2018 (D.I. 96, 1:16-cv-00651), which is currently in effect;

WHEREAS the Stipulated Protective Order allows for the filing under seal and redaction of confidential information (D.I. 25, 1:16-cv-00651 at ¶¶ 12-13), including information initially disclosed without a confidentiality marking (*Id.* at ¶ 16);

WHEREAS the Stipulated Protective Order defines “Confidential Information” to include non-public business plans and competitively sensitive business information (*Id.* at ¶ 2(d)(i));

WHEREAS the Court issued a Transcript of Proceedings held on January 25, 2018 (“the Transcript”) (D.I. 91, 1:16-cv-00651; D.I. 34, 1:17-cv-07903), which included a discussion of the date before which Fresenius Kabi would not launch its product;

WHEREAS the Court entered a Stipulation on January 29, 2018, which included a date for the event titled “Fresenius Kabi Will Not Launch (Without Opinion) Before” (D.I. 89, 93, 1:16-cv-00651; D.I. 32, 36, 1:17-cv-07903);

WHEREAS the date before which Fresenius Kabi would not launch its product is Confidential Information under the terms of the Stipulated Protective Order (D.I. 25, 1:16-cv-00651, at ¶ 2(d)(i));

WHEREAS Fresenius Kabi now wishes to seal the Stipulation and refile a public version redacting the date corresponding to the event titled “Fresenius Kabi Will Not Launch (Without Opinion) Before;”

WHEREAS Fresenius Kabi now wishes to seal the Transcript;

It is hereby STIPULATED AND AGREED, subject to the approval of the Court, that:

1. Fresenius Kabi is granted leave to file the Stipulation under seal and refile a public version redacting the date associated with the event titled “Fresenius Kabi Will Not Launch (Without Opinion) Before.”
2. Fresenius Kabi is granted leave to seal portions of the Transcript related to the date before which Fresenius Kabi would not launch its product, and refile a public version redacting the date before which Fresenius Kabi would not launch its product without an opinion.

ENTERED:

Date:

REBECCA R. PALLMEYER
United States District Judge