

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TEVA PHARMACEUTICALS
INTERNATIONAL GMBH and
TEVA PHARMACEUTICALS
USA, INC.,

Plaintiffs,

v.

ELI LILLY AND COMPANY,
Defendant.

Civil Action No.

1:18-cv-12029-ADB

**ASSENTED-TO MOTION FOR LEAVE TO IMPOUND CONFIDENTIAL EXHIBIT TO
DEFENDANT'S LETTER TO COURT**

Pursuant to Local Rule 7.2(d) and the Protective Order [Dkt 58], Defendant, Eli Lilly and Company ("Lilly" or "Defendant"), hereby moves this Court for an Order to impound or otherwise seal the following document, on the ground this document contains or reveals Plaintiffs' designated confidential and/or proprietary information:

1. Plaintiffs' Objections And Responses To Defendant Eli Lilly And Company's Notice Of Deposition Of Plaintiffs Pursuant To Fed. R. Civ. P. 30(B)(6) (attached as Exhibit 4 to Defendant's Letter).

WHEREFORE, Defendant respectfully requests that this Court allow this Motion.

Dated: July 16, 2021

Respectfully Submitted,

/s/Andrea L. Martin

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LR 7.1(a)(2) CERTIFICATION

I, Andrea L. Martin, hereby certify that Defendant's counsel reached out to meet and confer with Plaintiffs' counsel regarding this motion on July 15, 2021; Plaintiffs' counsel stated that Plaintiffs assent to this motion.

/s/Andrea L. Martin, Esq.
Andrea L. Martin, Esq.

CERTIFICATE OF SERVICE

I, Andrea L. Martin, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 16, 2021.

/s/Andrea L. Martin, Esq.
Andrea L. Martin, Esq.

4814-1705-1634.2