

**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

**TEVA'S [UNOPPOSED] MOTION FOR LEAVE TO FILE
CONFIDENTIAL DOCUMENTS UNDER SEAL**

Pursuant to Local Rule 7.2 of the United States District Court for the District of Massachusetts and the Protective Order (*Dkt.* 58), Plaintiffs Teva Pharmaceuticals International GmbH and Teva Pharmaceuticals USA, Inc. (collectively, "Teva") hereby move this Court for an Order to impound or otherwise seal the following documents, on the ground that these documents contain or reveal Defendant Eli Lilly and Company's ("Lilly") designated confidential and/or proprietary information. Where possible, Teva has publicly filed redacted versions of each of the below documents on the public ECF system:

1. Teva's Letter to the Court Regarding ESI Search Terms (the "Letter", *Dkt.* 99);
2. A document produced by Lilly bearing Bates nos. LLY-GALCA-00113904-24 and marked as CONFIDENTIAL under the Protective Order (attached as Exhibit B to the Letter); and

3. A document produced by Lilly bearing Bates nos. LLY-GALCA-00018440-49, and marked as CONFIDENTIAL under the Protective Order (attached as Exhibit C to the Letter).

Teva proposes that the Order sealing the exhibits described above be lifted only in the instance of a further order of the Court, and that the sealed documents be kept in the clerk's nonpublic information file during any post-impoundment period.

WHEREFORE, Teva respectfully requests that the Court allow this Motion.

Dated: February 18, 2021

Respectfully submitted,

/s/ Elaine Herrmann Blais

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LOCAL RULE 7.1 CERTIFICATION

I certify that counsel for the Parties conferred in good faith regarding the relief sought in this Motion. Defendant's counsel does not oppose the relief sought in this motion.

/s/ Elaine Herrmann Blais

CERTIFICATE OF SERVICE

I certify that, on February 18, 2021, the foregoing document was filed with the Clerk of the Court and served upon all counsel of record via the Court's CM/ECF system.

/s/ Elaine Herrmann Blais