

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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| PHILIPS NORTH AMERICA LLC, |) | |
| |) | |
| Plaintiff, |) | |
| |) | C.A. No. 1:19-cv-11586 |
| v. |) | |
| |) | |
| FITBIT, INC. |) | JURY TRIAL DEMANDED |
| |) | |
| Defendant. |) | |
| |) | |

**JOINT NOTICE FOR ENTRY OF AGREED
PROTECTIVE ORDER AND DISCOVERY STIPULATION**

The parties have met and conferred and have agreed to a protective order and stipulation on discovery as attached hereto, and jointly request that the Court enter the Agreed Protective Order and Discovery Stipulation as attached.

Jointly and respectfully submitted on this 31st day of March, 2020.

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| <p>FITBIT, INC. By its attorneys,</p> <p>By: <u>/s/ David Beckwith</u> Jennifer B. Furey (BBO 634,174) Andrew T. O' Connor (BBO 664,811) 400 Atlantic Avenue Boston, MA 02110 Phone: (617) 482-1776 Fax: (617) 574-4112 jffurey@goulstonstorrs.com aoconnor@goulstonstorrs.com</p> | <p>PHILIPS NORTH AMERICA LLC, By its attorneys,</p> <p>By: <u>/s/Ruben J. Rodrigues</u> Lucas I. Silva (BBO 673,935) Ruben Rodrigues (BBO 676,573) FOLEY & LARDNER LLP 111 Huntington Avenue Suite 2500 Boston, MA 02199-7610 Phone: (617) 342-4000 Fax: (617) 342-4001 <u>lsilva@foley.com</u> rrodrigues@foley.com</p> |
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 31, 2020 a copy of the foregoing document was filed with the Court through the ECF system and that a copy will be electronically served on registered participants as identified on the Notice of Electronic Filing.

/s/ Ruben J. Rodrigues
Ruben J. Rodrigues