

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

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

JOINT MOTION TO SUPPLEMENT THE PROTECTIVE ORDER

Plaintiff Philips North America, LLC (Philips) and Defendant Fitbit, Inc. (Fitbit) jointly request that the Court supplement the Protective Order by adding the Agreed Protective Order Addendum (Exhibit A), which includes provisions governing the remote production and review of source code.

Dated: June 2, 2020

PHILIPS NORTH AMERICA LLC,

FITBIT, INC.

By Its Attorneys,

By Its Attorneys,

/s/ Ruben J. Rodrigues

/s/ David Beckwith

Ruben Rodrigues (BBO 676,573)

Yar R. Chaikovsky

Lucas I. Silva (BBO 673,935)

yarchaikovsky@paulhastings.com

John Custer (BBO 705,258)

Chad Peterman

FOLEY & LARDNER LLP

chadpeterman@paulhastings.com

111 Huntington Avenue

Dave Beckwith

Suite 2500

davidbeckwith@paulhastings.com

Boston, MA 02199-7610

David Okano

Phone: (617) 342-4000

davidokano@paulhastings.com

Fax: (617) 342-4001

Radhesh Devendran

rrodrigues@foley.com

radheshdevendran@paulhastings.com

lsilva@foley.com

Berkeley Fife

jcuster@foley.com

berkeleyfife@paulhastings.com

Eley O. Thompson (*pro hac vice*)

PAUL HASTINGS LLP

FOLEY & LARDNER LLP

1117 S. California Avenue

321 N. Clark Street

Palo Alto, California 94304-1106

Suite 2800

Telephone: 1(650) 320-1800

Chicago, IL 60654-5313

Facsimile: 1(650) 320-1900

Phone: (312) 832-4359

Fax: (312) 832-4700

ethompson@foley.com

Jennifer B. Furey (BBO # 634174)

Andrew T. O'Connor (BBO # 664811)

GOULSTON & STORRS PC

400 Atlantic Avenue

Boston, MA 02110

Telephone: (617) 482-1776

Facsimile: (617) 574-4112

E-mail: jfurey@goulstonstorrs.com

aoconnor@goulstonstorrs.com

CERTIFICATE OF SERVICE

I certify that a true copy of the above document was served on the attorney of record for each party via the Court's CM/ECF system, which will send notification of this filing (NEF) to all registered participants, and paper copies will be sent to those indicated as nonregistered participants.

Dated: June 2, 2020

By: /s/ John W. Custer