EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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

AGREED PROTECTIVE ORDER ADDENDUM

12.   (D)   (xiii) In addition to the procedures detailed in Paragraph 12(D)(iii), access to the Source Code may be provided through a "remote-access" computer that provides remote access to the "stand-alone" computer(s). The supplier shall provide one remote-access computer to the receiving party. The remote-access computer may be password protected and shall be used by the receiving party for no purpose other than performing the review of Source Code. The receiving party shall not attempt to disable, defeat, or sidestep any security measures on the remote-access computer or the stand-alone computer. Nor shall the receiving party transfer any data from the stand-alone computer or otherwise access the stand-alone computer through means other than those provided by the supplier on the remote-access computer. The remote-access computer shall be accessed only in a location where it cannot be viewed by any person who is not a SOURCE CODE QUALIFIED PERSON. The remote-access computer shall not be used to create screenshots of the source code, to print any files directly (as opposed to the printing procedure in Paragraph 12(D)(ix), which remains available to the receiving party), to download any files from the stand-alone computer, or to take notes (notes are permitted to be taken on a separate non-networked computer pursuant to Paragraph 12(D)(vii)). Additionally, the receiving party is not permitted to take photographs or video of, or to otherwise record, the information on the screen of the remote- access computer. Whenever a review is to occur, the supplier must be notified, and

to exercise personal supervision of the receiving party. The video access shall be akin to monitoring a review of a stand-alone computer through a window to a conference room. Such video access, however, shall not entail review of any work product generated by the receiving party, e.g., monitoring the screen of the remote-access computer, monitoring any surface reflecting any notes or work product of the receiving party, or monitoring the key strokes of the receiving party.   During any remote access session as described above, the supplier may also make an automated recording of the receiving party's code review activity (i.e., a screen recording or automated list of the actions taken by the reviewer on the "stand-alone" computer) by using a recording feature on the stand-alone computer. However, the supplier shall not review any such automated recording of the code review activity unless a dispute arises about whether the receiving party has complied with the remote-access review protocol described above, in which case the producing party may review the recording solely to determine whether the protocol has been violated.