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## UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

CASE NO. 2:07-CV-02208 MCE EFB

STIPULATION AND ORDER RE: PARTIES' STIPULATED PROTECTIVE ORDER FOR THE PROTECTION OF CONFIDENTIAL INFORMATION

Case No. 2:07-CV-02208 MCE EFB

Pursuant to General Local Rule 83-143, the parties hereby stipulate that the Stipulated Protective Order for the Protection of Confidential Information (the "Protective Order") which has been entered in this action and which governs the handling by both parties and their counsel of confidential business information produced in this action will be deemed to apply also to Crowell & Moring LLP as B&H Manufacturing Company, Inc.'s ("B&H") co-counsel. The parties further agree that any specific references in the Protective Order to the law firms of MacPherson, Kwok, Chen & Heid, LLP or Haynes and Boone, LLP will be interpreted to refer also to Crowell & Moring LLP. B&H's original counsel, MacPherson, Kwok, Chen & Heid, LLP merged with another firm and became known as Haynes and Boone, LLP. Further, Crowell & Moring LLP has been retained by B&H to serve as co-counsel for B&H, together with Haynes and Boone, LLP. However, the Stipulated Protective Order at present makes no provision for access to confidential information by Crowell & Moring LLP. Hence, the parties agree as to the need to enter into the above-described stipulation.

## **CROWELL & MORING LLP**

## **SUGHRUE MION PLLC**

By: /s/ Thomas E. Dietrich
Thomas E. Dietrich
R. Scott Feldmann
Jonathan M. Lindsay

Co-counsel for Plaintiff and Counterdefendant B&H MANUFACTURING COMPANY, INC. By: /s/ John B. Scherling
John B. Scherling
(as authorized on April 16, 2009)

Attorneys for Defendant and Counterclaimant SIDEL, INC.

SO ORDERED

DATED: April 20, 2009

HON. EDMUND F. BRENNAN UNITED STATES MAGISTRATE JUDGE

Cam No. 105307.002 IR4192986.2 T. Birwa