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11 Attorneys for STRYKER CORPORATION and
 12 STRYKER SALES CORPORATION

13 UNITED STATES DISTRICT COURT
 14 EASTERN DISTRICT OF CALIFORNIA
 15 SACRAMENTO DIVISION

17 TERRI LYNN TODD,
 18 Plaintiff,
 19 v.
 20 STRYKER CORPORAION, a Michigan
 21 corporation; and STRYKER SALES
 CORPORATION, a Michigan corporation,
 22 Defendants.

Case No. 2:09-cv-01509-JAM-GGH

**STIPULATION AND PROPOSED ORDER
 TO FILE UNDER SEAL DEFENDANTS
 STRYKER CORPORATION AND
 STRYKER SALES CORPORATION'S
 EXHIBITS IN SUPPORT OF ITS MOTION
 FOR SUMMARY JUDGMENT OR, IN
 THE ALTERNATIVE, PARTIAL
 SUMMARY JUDGMENT AND EXHIBITS
 TO PLAINTIFF'S OPPOSITION TO SAID
 MOTION**



1 Defendants Stryker Corporation and Stryker Sales Corporation (“Stryker”) and Plaintiff
2 Terri Todd (“Plaintiff”) hereby agree and stipulate as follows:

3 1. On February 9, 2011, Stryker filed a Motion for Summary Judgment or, in the
4 Alternative, Partial Summary Judgment (“Motion”) in this action. In support of its Motion,
5 Stryker concurrently filed the Declaration of Wayne A. Wolff attaching Exhibits “A” through
6 “KK”.

7 2. Exhibits I, J, L, N, O, P, and R thru Y (“Confidential Exhibits”) contain
8 confidential discovery material and other information that are subject to a Protective Order
9 entered in this action on July 9, 2010 (“Protective Order”). Under the terms of the Protective
10 Order, the Confidential Exhibits should have been filed under seal but were inadvertently filed
11 without seal.

12 3. Based on the Protective Order, the parties stipulate and respectfully request the
13 Court allow the Confidential Exhibits be filed under seal and removed from the CM/ECF system.

14 4. In addition, the parties stipulate and respectfully request the Court to allow
15 Plaintiff leave to file exhibits submitted in support of her Opposition to Stryker’s Motion, which
16 contain confidential material or information otherwise subject to the Protective Order, under seal.

17 5. The parties agree that they seek orders sealing or granting leave to seal only to
18 avoid noncompliance with the parties’ agreement and do not agree or waive any rights to assert
19 at a later time that the documents are not confidential or trade secret.

20 **IT IS SO STIPULATED.**

21 Dated this 11th day of February, 2011.

22
23 WILLIAMS LOVE O’LEARY & POWERS
P.C.

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21 CORPORATION, a Michigan corporation,
22 Defendants.

Case No. 2:09-cv-01509-JAM-GGH

**ORDER TO FILE UNDER SEAL
DEFENDANTS STRYKER
CORPORATION AND STRYKER SALES
CORPORATION'S EXHIBITS IN
SUPPORT OF ITS MOTION FOR
SUMMARY JUDGMENT OR, IN THE
ALTERNATIVE, PARTIAL SUMMARY
JUDGMENT AND EXHIBITS TO
PLAINTIFF'S OPPOSITION TO SAID
MOTION**

Sedgwick
DETERT, MORAN & ARNOLD LLP

1 Pursuant to joint request by stipulation of the parties and the Protective Order in this
2 action, IT IS HEREBY ORDERED THAT:

3 Exhibits I, J, L, N, O, P, and R thru Y (“Confidential Exhibits”) to the Declaration of
4 Wayne A. Wolff In Support of Defendants Stryker Corporation and Stryker Sales Corporation’s
5 Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment filed by
6 Defendants Stryker Corporation and Stryker Sales Corporation on February 9, 2011 shall be filed
7 under seal and removed from the CM/ECF system..

8 Plaintiff is granted leave to file exhibits submitted in support of her Opposition to
9 Stryker’s Motion, which contain confidential material or information otherwise subject to the
10 Protective Order, under seal.

11 DATED: February 11, 2011

12 /s/ John A. Mendez
13 Honorable John A. Mendez
14 United States District Court Judge

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