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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SANOFI-AVENTIS DEUTSCHLAND
GMBH,

Plaintiff,

v.

GENENTECH, INC. AND BIOGEN IDEC
INC.,

Defendants.

CASE NO. C 08-04909 SI (BZ)
CASE NO. C 09-4919 SI

**STIPULATION AND [PROPOSED]
ORDER GRANTING LEAVE TO
FILE UNDER SEAL DOCUMENTS
RELATED TO SANOFI'S
OPPOSITION TO GENENTECH'S
CIVIL L.R. 6-3 MOTION TO
ENLARGE TIME TO OPPOSE
SANOFI-AVENTIS DEUTSCHLAND
GMBH'S MOTION TO AMEND ITS
PLEADINGS AND INFRINGEMENT
CONTENTIONS**

COUNSEL LISTED ON FOLLOWING PAGE

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1 Pursuant to Local Rule 79-5, the Court's Standing Order, and the Stipulated Protective
2 Order, the parties hereby stipulate to the filing under seal of all documents designated
3 "Confidential," "Highly Confidential," and/or "Attorney's Eyes Only" and appended as exhibits to
4 declarations filed in support of Sanofi's Opposition to Genentech's Civil L.R. 6-3 Motion to
5 Enlarge Time to Oppose Sanofi-Aventis Deutschland GmbH's Motion for Leave to Amend Its
6 Pleadings and Infringement Contentions.

7 The briefs and these appended exhibits may include materials that the parties have
8 designated "Confidential," "Highly Confidential," and/or "Attorney's Eyes Only" pursuant to the
9 Stipulated Protective Order. Accordingly, the parties request that the Court order that those
10 declaration exhibits so designated be filed under seal.

11 DATED: January 29, 2010

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12
13 By /s/ Victoria F. Maroulis

14 Victoria F. Maroulis
15 Attorneys for Defendant
Genentech, Inc.

16 DATED: January 29, 2010

FOLEY HOAG LLP

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19 Marco J. Quina
20 Attorneys for Defendant
Biogen Idec Inc.

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22 DATED: January 29, 2010

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25 Jeremy E. Noe
26 Attorneys for Plaintiff
Sanofi-Aventis Deutschland GmbH

1 I, Raffi V. Zerounian, am the ECF User whose identification and password are being used
2 to file this document. Pursuant to General Order 45.X.B, I hereby attest that counsel for
3 Defendants have concurred in this filing.

4 DATED: January 29, 2010 HARVEY SISKIND LLP

6 By _____/s/_____
7 Raffi V. Zerounian
8 Attorneys for Plaintiff
9 Sanofi-Aventis Deutschland GmbH

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[PROPOSED] ORDER

Pursuant to the stipulation of the parties and with good cause appearing, the Court GRANTS the parties leave to file under seal all documents filed in relation to Sanofi’s Opposition to Genentech’s Civil L.R. 6-3 Motion to Enlarge Time to Oppose Sanofi-Aventis Deutschland GmbH’s Motion for Leave to Amend Its Pleadings and Infringement Contentions designated “Confidential,” “Highly Confidential,” and/or “Attorney’s Eyes Only.”

IT IS SO ORDERED.

February __, 2010



The Honorable Susan Illston
UNITED STATES DISTRICT JUDGE