

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CHURCH & DWIGHT CO., INC.,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	No.: CV3:10-04429 EMC
	:	
MAYER LABORATORIES, INC.,	:	
	:	
Defendant.	:	

**STIPULATION AND ORDER FOR LEAVE TO
FILE SUMMARY JUDGMENT MEMORANDA AND EXHIBITS
UNDER SEAL (ORDER)**

The undersigned attorneys respectfully request the Court for leave to file under seal their briefs in support of and in opposition to Plaintiff Church & Dwight Co, Inc.'s ("Church & Dwight") Motion for Summary Judgment, and exhibits attached thereto. Church & Dwight's Motion for Summary Judgment will be filed on Friday, January 6, 2012.

The parties' memoranda and the exhibits attached thereto will contain numerous quotations, summaries, descriptions and discussion of documents produced by Church & Dwight or Mayer Laboratories, Inc. ("Mayer"). These documents contain sensitive information, including confidential and proprietary business information, competitively sensitive technical information, and personal information. Therefore, the parties have designated these documents as "confidential" pursuant to the May 7, 2009 Stipulation & Order for the Protection of Confidential Information. (See May 7, 2009 Protective Order, Docket No. 37.)

Each party reserves the right to challenge the other party's designation of documents as "confidential" or "attorneys eyes only."

For the reasons set forth above, the parties respectfully request this Court for leave to file under seal the briefs, including any reply brief, in support of and in opposition to Church & Dwight's Motion for Summary Judgment, and the exhibits attached thereto.

Dated: January 4, 2012.

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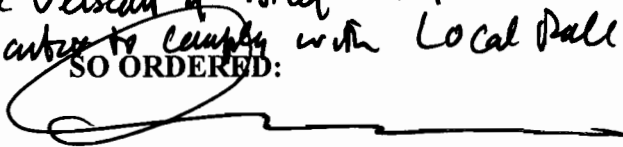
Attorneys for Defendant

I attest that concurrence in the filing of this document has been obtained from the other signatory.

By: s/ Carl W. Hittinger
Carl W. Hittinger

By: s/ Paul Novak
Paul Novak

Parties to file ^{public} redacted version of brief within 7 days of filing under seal. Parties to comply with Local Rule 79-5(c).

SO ORDERED:


The Honorable Edward M. Chen