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 11 Attorneys for Defendant
 CREATIVE NAIL DESIGN, INC.

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16
 17 MYCONE DENTAL SUPPLY CO., INC.,
 D/B/A/ KEYSTONE RESEARCH &
 18 PHARMACEUTICAL,

19 Plaintiff,

20 vs.

21 CREATIVE NAIL DESIGN, INC.,

22 Defendant.

Case No. 3:12-cv-00747-RS

**STIPULATION AND [~~PROPOSED~~] ORDER
 TO AMEND PROTECTIVE ORDER**

23 AND RELATED COUNTERCLAIM
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1 WHEREAS, on December 3, 2012, the Court entered a Stipulated Protective Order
2 (Docket No. 93); and

3 WHEREAS, the Stipulated Protective Order governs discovery and confidentiality in the
4 above-captioned action for all named parties;

5 WHEREAS, third parties have been served and will be served with discovery that calls for
6 the production of Confidential Information; and

7 WHEREAS, a third party has requested a modification of the Stipulated Protective Order
8 that the third party deems necessary to ensure that its Confidential Information is adequately
9 protected;

10 Defendant/Counterclaim Plaintiff Creative Nail Design, Inc. (“CND”), Plaintiff Mycone
11 Dental Supply Co., Inc. (“Keystone”), and Counterclaim Defendants Young Nails, Inc., Cacee,
12 Inc. and Nail Systems International (“Counterclaim Defendants”), by and through their respective
13 counsel, hereby stipulate and agree, subject to the Court’s approval, that the Stipulated Protective
14 Order shall be amended as follows:

15 2.2 “CONFIDENTIAL” Information or Items: information (regardless of how it is
16 generated, stored or maintained) or tangible things (a) that contain private or confidential personal
17 information, or (b) that contain information received in confidence from third parties, or (c)
18 which the producing party otherwise believes in good faith to be entitled to protection under Rule
19 26(c)(1)(G) of the Federal Rules of Civil Procedure.

20 2.8 “HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY”
21 Information or Items: extremely sensitive “Confidential” Information or Items pertaining to (a)
22 technical materials, methods, or processes that are or could be used by a producing party to
23 manufacture its products, the disclosure of which to another Party or Non-Party would create a
24 substantial risk of serious harm that could not be avoided by less restrictive means or (b) trade
25 secrets, competitively sensitive technical, marketing, financial, sales or other confidential
26 business information.

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IT IS STIPULATED THROUGH COUNSEL OF RECORD.

Dated: October 23, 2013

FREITAS TSENG & KAUFMAN LLP

By: /s/ Craig R. Kaufman
Craig R. Kaufman
Attorney for Defendant and Counterclaim Plaintiff
CREATIVE NAIL DESIGN, INC.


Dated: October 23, 2013

FISH & RICHARDSON P.C.

By: /s/ John M. Farrell
John M. Farrell
Attorney for Plaintiff
MYCONE DENTAL SUPPLY CO., INC. D/B/A
KEYSTONE RESEARCH &
PHARMACEUTICALS

IT IS SO ORDERED.

Dated: 10/23/13



The Honorable Richard Seeborg
United States District Judge