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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TRIREME MEDICAL, LLC,

Plaintiff,

vs.

ANGIOSCORE, INC.,

Defendant.

Case No.: 3:14-cv-02946-LB

**STIPULATION AND ORDER
REGARDING SEALING OF
ANGIOSCORE'S MOTION FOR
SUMMARY JUDGMENT AND EXHIBITS
ATTACHED TO DECLARATIONS IN
SUPPORT THEREOF**

Pursuant to Civil Local Rules 7-11, 7-12, and 79-5, Defendant AngioScore, Inc. ("AngioScore") and Plaintiff TriReme Medical, LLC ("TriReme"), through their respective counsel of record, hereby stipulate to and respectfully request that the documents in the below table be sealed, in whole or in part, as indicated. These documents contain information that AngioScore, TriReme, or third parties have designated as confidential, including information designated as HIGHLY CONFIDENTIAL - ATTORNEY'S EYES ONLY. AngioScore's bases for sealing these documents are set forth in the attached Declaration of Matthew Robson in Support of Stipulated Motion to File Documents Under Seal.

Specifically, AngioScore identifies the following as needing to be filed under seal:

Index	Document	Sealable Portions
1	Defendant AngioScore's Notice of Motion and Motion for Summary Judgment	<ul style="list-style-type: none"> Portion of p. 4. [description of confidential financial information of Mr. Feld]
2	Opening Expert Report of T. Kim Parnell, Ph.D., P.E.	<ul style="list-style-type: none"> Entire document
3	Parnell Rpt. Ex. L	<ul style="list-style-type: none"> Entire document
4	Parnell Rpt. Ex. M	<ul style="list-style-type: none"> Entire document
5	Parnell Rpt. Ex. N	<ul style="list-style-type: none"> Entire document
6	Parnell Rpt. Ex. O	<ul style="list-style-type: none"> Entire document
7	Parnell Rpt. Ex. P	<ul style="list-style-type: none"> Entire document
8	Parnell Rpt. Ex. Q	<ul style="list-style-type: none"> Entire document
9	Parnell Rpt. Ex. R	<ul style="list-style-type: none"> Entire document
10	Parnell Rpt. Ex. S	<ul style="list-style-type: none"> Entire document
11	Parnell Rpt. Ex. T	<ul style="list-style-type: none"> Entire document
12	Parnell Rpt. Ex. BB	<ul style="list-style-type: none"> Entire document
13	Robson Decl. Ex. 6 - Feld deposition transcript	<ul style="list-style-type: none"> 36:19-38:13
14	Robson Decl. Ex. 8 - Email from Lotan Chaim to Gary Gershony copying Eitan Konstantino, Ephraim Heller, and Tanhum Feld regarding an Animal Study dated July 28, 2004 bearing bates numbers ANGIOSCORE00003719-3720	<ul style="list-style-type: none"> Entire document
15	Robson Decl. Ex. 9 - Manufacturing Flow Chart for the AngioSculpt Scoring Catheter dated July 23, 2003 bearing bates numbers ANGIOSCORE00013230-13231	<ul style="list-style-type: none"> Entire document
16	Robson Decl. Ex. 10 - Email chain between from Ephraim Heller to Eitan Konstantino, Nimrod Tzori, Gary Gershony, and copying Tanhum Feld regarding the Animal Trial dated April 15, 2003 and bearing bates numbers ANGIOSCORE00011458-11459	<ul style="list-style-type: none"> Entire document

1 Accordingly, the parties hereby stipulate and respectfully request the portions of documents
2 listed above be filed under seal.

3
4 Respectfully Submitted,

5 Dated: January 3, 2017

QUINN EMANUEL URQUHART & SULLIVAN
LLP

6
7 By: /s/ Matthew Robson
Matthew Robson
8 Attorneys for Defendant
9 ANGIOSCORE, INC.

10 Dated: January 3, 2017

ARNOLD & PORTER LLP

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12 By: /s/ Michael D.K. Nguyen
Michael D.K. Nguyen
13 Attorneys for Plaintiff
14 TRIREME MEDICAL, LLC

15 **PROPOSED ORDER**

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17
18 Dated: 1/5/2017



19 Hon. Laurel Beeler
20 United States Magistrate Judge
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1 **ATTESTATION**

2 I, Matthew Robson, am the ECF User whose ID and password are being used to file this
3 document. In compliance with Local Rule 5-1(i)(3), I hereby attest that Michael D.K. Nguyen has
4 concurred in this filing.

5
6 Date: January 3, 2017

/s/ Matthew Robson

Matthew Robson