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 20 ANHEUSER-BUSCH, INC.

21 UNITED STATES DISTRICT COURT
 22 SOUTHERN DISTRICT OF CALIFORNIA

23 UNITED BRANDS COMPANY, INC.,

24 Plaintiff,

25 v.

26 ANHEUSER-BUSCH, INC.

27 Defendant

CASE NO. 10-cv-02281-AJB-KSC

**JOINT MOTION TO FILE [PROPOSED]
 STIPULATED PROTECTIVE ORDER
 REGARDING CONFIDENTIAL AND
 TRADE SECRET INFORMATION**

Courtroom: **F**
 Judge: **Hon. Karen S. Crawford**

1 Plaintiff, United Brands Company, Inc., and the Defendant, Anheuser-Busch, Inc.,
2 hereinafter the “Parties”, hereby jointly move for entry of the [Proposed] Stipulated Protective
3 Order, submitted herewith as Exhibit 1.

4 The parties recognize that some of the documents and information being produced for
5 purposes of settlement discussions and mediation, as well as sought through discovery in the
6 above-captioned action, are normally kept confidential by the parties. Such documents to be
7 exchanged by the parties and potentially produced by non-parties may contain confidential,
8 proprietary, or trade secret information. The purpose of this joint motion and [Proposed]
9 Stipulated Protective Order is to protect the confidentiality of such documents and information as
10 permitted by the federal and local rules and applicable law during the litigation.

11 The parties have agreed to be bound by the terms of the [Proposed] Stipulated Protective
12 Order. Accordingly, in conformance with the procedures set forth in Judge Crawford’s chamber
13 rules, the parties jointly move the Court for entry of the [Proposed] Stipulated Protective Order.
14 The Protective Order shall govern the use of confidential information produced for purposes of
15 settlement and mediation, and in discovery for this proceeding.

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1 Dated: April 23, 2012

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Dated: April 23, 2012

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