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 Attorneys for Defendant  
 7 FERRERO U.S.A, INC.

8  
 9 UNITED STATES DISTRICT COURT  
 10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

11	)	CASE NO.: 11 CV 0205 (H CAB)
12	)	
13	)	
14	)	JOINT MOTION REQUESTING
15	)	ENTRY OF PROTECTIVE ORDER
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1           WHEREAS Plaintiffs Athena Hohenberg and Laura Rude-Barbato and Defendant Ferrero  
2 U.S.A., Inc. (the “parties”) have stipulated to the terms of a proposed protective order to govern  
3 the production of confidential and proprietary information in this action;

4           WHEREAS, the form of the stipulated protective order, as agreed upon by the parties, is  
5 attached hereto as Attachment A.;

6           THEREFORE, the parties, by and through their undersigned counsel, jointly request and  
7 hereby move for the entry of a Protective Order regarding confidential information in this matter  
8 in the form set forth in Attachment A or as otherwise deemed appropriate by the Court.

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10 Dated: April 8, 2011

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

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By: s/ Dale R. Bish  
Dale R. Bish

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Attorneys for Defendant  
FERRERO U.S.A., INC.

16

17 Dated: April 8, 2011

THE WESTON FIRM

18

19

By: s/ Gregory S. Weston  
Gregory S. Weston

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Attorneys for Plaintiffs Athena Hohenberg and  
Laura Rude-Barbato.

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1 I, Dale R. Bish, am the ECF User whose identification and password are being used to file this  
2 Stipulation. I hereby attest that Gregory S. Weston has concurred in this filing.

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Dated: April 8, 2011

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: s/ Dale R. Bish  
Dale R. Bish  
Attorneys for Defendant Ferrero U.S.A., Inc.  
E-mail: [dbish@wsgr.com](mailto:dbish@wsgr.com)

1 CERTIFICATE OF SERVICE

2 I am employed in the County of Santa Clara, State of California. I am over the age of  
3 eighteen years and not a party to the within action; my business address is 650 Page Mill Road,  
4 Palo Alto, California 94104-1050.

5 On April 8, 2011, I served the following document on the interested parties in this action:  
6 **JOINT MOTION REQUESTING ENTRY OF PROTECTIVE ORDER** by causing the  
7 above document to be served via the Court's Electronic Filing System on the following  
8 registered parties shown on the court's service list by posting such document electronically to the  
9 ECF website of the united States District Court for the Southern District of California:

10 Ronald A. Marron, Esq.  
11 [ron.marron@gmail.com](mailto:ron.marron@gmail.com)  
12 Law Offices of Ronald A. Marron, APLC  
13 3634 4<sup>th</sup> Avenue, Suite 202  
14 San Diego, CA 92103

15 Gregory S. Weston  
16 Jack Fitzgerald  
17 [greg@westonfirm.com](mailto:greg@westonfirm.com)  
18 [jack@wsestonfirm.com](mailto:jack@wsestonfirm.com)  
19 The Weston Firm  
20 888 Turquoise Street  
21 San Diego, CA 92109

22 I declare under penalty of perjury under the laws of the United States of America that the  
23 foregoing is true and correct.

24 Dated: April 8, 2011

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

25 By: s/ Dale R. Bish  
26 Dale R. Bish  
27 Attorneys for Defendant Ferrero U.S.A., Inc.  
28 E-mail: [dbish@wsgr.com](mailto:dbish@wsgr.com)