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

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

11)	CASE NO.: 11 CV 0205 (H CAB)
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14)	JOINT MOTION REQUESTING
14)	ENTRY OF PROTECTIVE ORDER
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13 In re FERRERO LITIGATION

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JOINT MOTION REQUESTING ENTRY OF
 PROTECTIVE ORDER

11CV0205

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, a copy of the stipulated proposed protective order, in the form agreed upon by
5 the parties, is being submitted to the Court via electronic mail, consistent with the local rules of
6 the Court;

7 THEREFORE, the parties, by and through their undersigned counsel, jointly request and
8 hereby move for the entry of a Protective Order regarding confidential information in this matter
9 in the form set forth in the proposed protective order submitted to the Court, or as otherwise
10 deemed appropriate by the Court.

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12 Dated: April 15, 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.

18

19 Dated: April 15, 2011

20

THE WESTON FIRM

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22

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 15, 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

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 15, 2011, I served the following document on the interested parties in this
6 action: **JOINT MOTION REQUESTING ENTRY OF PROTECTIVE ORDER** by causing
7 the 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
12 Law Offices of Ronald A. Marron, APLC
13 3634 4th Avenue, Suite 202
14 San Diego, CA 92103

15 Gregory S. Weston
16 Jack Fitzgerald
17 greg@westonfirm.com
18 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 15, 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