

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMGEN INC.,)
)
)
 Plaintiff,)
)
 v.)
)
 F. HOFFMANN-LA ROCHE LTD,)
 ROCHE DIAGNOSTICS GMBH,)
 and HOFFMANN-LA ROCHE INC.,)
)
 Defendants.)

CIVIL ACTION No.: 05-CV-12237WGY

**DEFENDANTS' PROPOSED ORDER OF IMPOUNDMENT OF DOCUMENTS FILED
UNDER SEAL CONTAINING DEFENDANTS' CONFIDENTIAL AND TRADE
SECRET MATERIALS**

Upon consideration of the Emergency Motion For Order Requiring Plaintiff To File Under Seal Documents Containing Defendants' Confidential And Trade Secret Materials, it is hereby ordered that the Motion is granted. The material identified in the Motion may be filed with the Court under seal pursuant to Local Rule 7.2.

The material identified in the Motion shall be impounded until termination of this action or further order of the Court. Upon termination or expiration of this Order, counsel filing the material shall immediately make arrangements to retrieve or destroy it.

SO ORDERED on this ___ day of _____, 200__.

SO ORDERED:

The Honorable William G. Young
 United States District Court
 District of Massachusetts