

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

_____)	
AMGEN INC.,)	
)	
Plaintiff,)	
v.)	
)	Civil Action No. 05-CV-12237WGY
F. HOFFMANN-LA ROCHE LTD.,)	
ROCHE DIAGNOSTICS GMBH, and)	
HOFFMANN-LA ROCHE INC.,)	
)	
Defendants.)	
_____)	

STIPULATION FOR A TEMPORARY PROTECTIVE ORDER

The parties hereto stipulate that for purposes of exchanging information, documents, and things pursuant to the Court’s May 11, 2006 Order only, and pending further agreement by the parties or an Order by this Court, any and all information designated “confidential” by any party, which is provided or disclosed by any party to any opposing party in response to said Order, will be disclosed solely to outside counsel of record herein and used solely for the purposes of this litigation, and shall not be disclosed to any other person or used for any other purpose, until a protective order is entered by the Court further governing such confidential information.

This Protective Order is temporary only and entered into subject to Amgen's insistence that in house counsel ultimately be granted access under a separate Protective Order to all discovery in this matter. Defendants reserve the right to oppose Amgen’s position regarding access by in house counsel under any separate Protective Order entered by the Court in this matter.

Date: May 23, 2006

AMGEN INC.
By its attorneys

/s/ Linda A. Sasaki-Baxley

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on the above date.

/s/ Keith E. Toms

Keith E. Toms

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