

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

KONINKLIJKE PHILIPS N.V. AND PHILIPS  
ELECTRONICS NORTH AMERICA  
CORPORATION,

Plaintiffs,

v.

ZOLL MEDICAL CORPORATION,

Defendant.

CIVIL ACTION NO. 10-cv-11041-NMG

**JOINT MOTION TO AMEND STIPULATED PROTECTIVE ORDER**

Plaintiffs Koninklijke Philips N.V. and Philips North America LLC (“Phillips”) and Defendant ZOLL Medical Corporation (“ZOLL”), hereby jointly move for an Order amending the Stipulated Protective Order, which was originally entered on October 26, 2011, and amended on June 27, 2014. The parties have reached agreement on all of the terms of the proposed Second Amended Protective Order, attached hereto as Exhibit 1. The amendments are in Paragraph 20 and increase the number of in-house counsel who can view confidential information from two to three attorneys.

*Subject to the caveat added on page 20 of the amended protective order, motion allowed.*

*J.M. Gorton, USDJ 3/30/17*