

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MEIJER, INC., and MEIJER  
DISTRIBUTION, INC., on behalf of  
themselves and all others similarly situated,

Plaintiffs

v.

RANBAXY INC., and SUN  
PHARMACEUTICAL INDUSTRIES LTD.

Defendants

Civil Action No. 15-cv-11828-NMG

Class Action

**JOINT MOTION FOR ENTRY OF  
[PROPOSED] AMENDED CONFIDENTIALITY PROTECTIVE ORDER**

Counsel for the parties jointly submit a [proposed] amended confidentiality protective order, attached as Exhibit A.

The plaintiffs have requested in discovery from defendants Ranbaxy, Inc. and Sun Pharmaceutical Industries Ltd. unredacted copies of the materials produced and filed in the case of *Ranbaxy Pharmaceuticals, Ltd. v. Burwell*, No 14-cv-1923 (D.D.C.) (the "*Burwell* action"). The parties have been working together to resolve confidentiality issues related to those materials, particularly relating to non-parties to this case whose information is contained in the record from the *Burwell* action. The most efficient means of resolving those issues is to amend the discovery confidentiality order entered by this court [ECF #93] to allow those non-parties to designate certain information in a manner that prevents in-house counsel for the parties in this case from accessing the information. The proposed amended confidentiality protective order achieves this, by adding a category of "Highly Confidential – Outside Attorneys' Eyes Only."<sup>1</sup>

<sup>1</sup> It also incorporates the handwritten change made by the Court when initially entering the order to paragraph 7 concerning the filing of material under seal. A redline showing all proposed edits to the original discovery confidentiality order is attached as *Exhibit B*.

*Joint Motion allowed.*

*JMGorton, US DJ 11/16/16*