

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

OXFORD IMMUNOTEC LTD., )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 QIAGEN N.V., )  
 QIAGEN, INC., )  
 QUEST DIAGNOSTIC INCORPORATED, )  
 and )  
 LABORATORY CORPORATION OF )  
 AMERICA HOLDINGS, )  
 )  
 Defendants.

Civil Action No.: 1:15-cv-13124-NMG

**JOINT MOTION FOR PROTECTIVE ORDER  
AND PROTOCOL FOR PRODUCTION OF DOCUMENTS**

Plaintiff Oxford Immunotec Limited (“Oxford”) and defendants Qiagen, Inc. (“Qiagen”), Quest Diagnostics Incorporated (“Quest”), and Laboratory Corporation of America Holdings (“LabCorp”) respectfully request that the Court enter both (1) the Joint Stipulated [Proposed] Protective Order Regarding the Treatment of Confidential Information (“Protective Order”), attached as Exhibit A, and (2) the Stipulation and [Proposed] Order Regarding the Protocol for the Production of Electronically Stored Information and Hard Copy Documents (“ESI Stipulation”), attached as Exhibit B.

In support of this Motion, the Parties represent that disclosures and discovery activity in this litigation are likely to involve confidential, proprietary, or private information for which special protection from public disclosure is warranted. Entry of the proposed joint stipulated Protective Order will permit discovery to proceed expeditiously without jeopardizing the confidential treatment of such information. Additionally, the Parties anticipate that entry of the

*Subject to the caveat on page 9 of the Order, motion allowed.*

*J. M. Gordon, USDSJ 1/4/17*