

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

AMAX, INC. and WORKTOOLS, INC.,  <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> ACCO BRANDS CORP.  <p style="text-align: center;">Defendant.</p>
--

Case No.: 1:16-cv-10695-NMG

**JOINT MOTION FOR A PROTECTIVE ORDER**

Plaintiffs Amax, Inc. and WorkTools, Inc. (“Plaintiffs”) and ACCO Brands Corp. (“Defendant”), by and through their undersigned counsel, hereby move to enter the Stipulated Protective Order, attached as Exhibit A.

AMAX, INC. AND WORKTOOLS, INC.

ACCO BRANDS CORP.

By Their Attorneys,

By Its Attorneys,

/s/ Christine K. Bush  
 Christine K. Bush (BBO No. 635381)  
 cbush@hinckleyallen.com  
 HINCKLEY, ALLEN & SNYDER LLP  
 100 Westminster Street, Suite 1500  
 Providence, Rhode Island 0 2903  
 (401) 274-2000 Phone  
 (401) 277-9600 Fax

/s/ Chad S.C. Stover  
 Chad S.C. Stover (*admitted pro hac vice*)  
 Chad.Stover@btlaw.com  
 Barnes & Thornburg LLP  
 1000 N. West Street, Suite 1500  
 Wilmington, DE 19801  
 (302) 300-3474 Phone

Jason C. Williams (BBO No. 691051)  
 jwilliams@hinckleyallen.com  
 HINCKLEY, ALLEN & SNYDER LLP  
 28 State Street  
 Boston, Massachusetts 02109  
 (617) 345-9000 Phone  
 (617) 345-9020 Fax

Heather B. Repicky (BBO #663347)  
 hrepicky@nutter.com  
 Nutter McClennen & Fish LLP  
 Seaport West  
 155 Seaport Boulevard  
 Boston, MA 02210  
 (617) 439-2000 Phone

*Subject to the caveat stated on p. 14 of the protective order,  
 motion allowed. /s/ M. Gorton, US DJ 9/13/17*