



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANGULO CAPITAL CORP.  
and GERARD ANGULO,

Plaintiffs,

- against -

SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP,

Defendant.

Civil Action No.: 04 CV 3114 (KMW)

**STIPULATION AND  
ORDER OF CONFIDENTIALITY**

WHEREAS Skadden, Arps, Slate Meagher & Flom LLP ("Skadden"), defendant in the above-captioned action, has been directed by the Court to provide to counsel for plaintiffs certain confidential and propriety documents in further support of Skadden's motion to dismiss:

NOW, THEREFORE, the undersigned, Eric W. Berry, Esq. ("Berry"), counsel for plaintiffs, stipulates and agrees as follows:

1. The documents provided to Berry including, (1) the Partnership Agreement of Skadden, Arps, Slate Meagher & Flow LLP (Delaware), and all amendments thereto, (2) the Skadden Partnership Retirement Agreement, and all amendments thereto, and (3) the Skadden Partnership Withdrawal Agreement, and all amendments thereto (collectively the "Agreements"), are confidential and proprietary information.

2. The Agreements shall be held by Berry in the strictest of confidence, and are being provided to Berry on an "attorney's eyes only" basis, for review by the undersigned only.

3. The Agreements shall not be copied, distributed, shown or revealed in any other manner, either directly or indirectly, to any other person including, but not limited to, plaintiffs in the above-captioned action.

4. Plaintiffs shall have the right to use the Agreements in connection with any application to the Court provided the Agreements are marked "Confidential," and submitted to the Court under seal. Additionally, any pleadings submitted in connection with such application referencing the Agreements shall likewise be submitted under seal; with a re-dacted version of such pleadings excising any confidential information used for public filing.

5. The undersigned shall promptly return the Agreements to counsel for Skadden following dismissal, voluntary withdrawal or resolution in any other manner of the above-captioned action.

Dated: New York, New York  
October 4, 2004

SO ORDERED: N.Y., N.Y.

10-21-04



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KIMBA M. WOOD  
U.S.D.J.

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ZEICHNER ELLMAN & KRAUSE LLP

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ERIC W. BERRY LAW OFFICE PC

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