IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

QVC, INC.

Plaintiff,

CIVIL ACTION

vs.

NO. 06-CV-4231-TON

STACEY SCHIEFFELIN. DAVID SCHIEFFELIN and MODELS PREFER, LTD.

FILED MAR 16 2007

Defendants.

STIPULATION TO FILE DOCUMENT UNDER SEAL

The parties, by their respective undersigned counsel, hereby stipulate and agree as follows:

- 1. On October 31, 2006, defendants filed a Motion to Dismiss Amended Complaint and to Strike Paragraphs of Amended Complaint for Violation of FRE 408 (the "Motion to Dismiss"), attached to which as Exhibit "2" was a copy of the contract at issue in the within civil action (the "Contract").
- 2. The plaintiff has requested that the Contract be filed under seal as confidential information of QVC, Inc.
- 3. Pursuant to Local Rule 5.1.5, the Contract should be detached from the Motion to Dismiss, placed in the envelope attached hereto, and filed under seal in this action.
- 4. This stipulation is without prejudice to any party's claim of right to use the Contract as evidence in the trial of this action, subject to a reasonable method of protecting

the confidentiality of the Contract, pursuant to agreement of the parties or order of the Court.

Nathaniel Metz
(Signature Validation No. NM264)
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Dated: December 15, 2006

Antoinette R. Stone
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ROONEY PC
1835 Market St., 14th Floor
Philadelphia, PA 19103
(215)665-8700

Attorneys for Defendants

Dated: December 15, 2006

APPROVED AND SO ORDERED:

ENTERED

MAR 1 6 2007

Thoreon U.S.D.J.

3/16/07 First received Dry this office on this date

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