

IN RE: NUVARING LITIGATION

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION

BERGEN COUNTY

Case No. 284 (MT)

CIVIL ACTION

FILED

JUL 24 2012

BRIAN R. MARTINOTTI, J.S.C.

PARTIES' PROPOSED STIPULATION AND CONSENT ORDER

REGARDING FILING OF MOTIONS UNDER SEAL

THIS MATTER having come before the Court via conference call, and counsel for Plaintiffs and Defendants having met and conferred, the parties hereby stipulate that either party may file under seal their motions to exclude expert witness testimony pursuant to N.J.R.E. 702, including all exhibits thereto. Within 10 days after the filing of any such motion, the parties shall meet and confer to decide whether they can agree that certain aspects of the motion (including memorandum of law and exhibits) may be unsealed or that certain aspects of the motion may remain sealed per agreement of the parties. If the parties cannot agree that certain aspects of the motion should remain sealed, then Defendants may move the Court pursuant to Rule 1:38-11 to seal those aspects of the record. The parties shall communicate the results of their meet and confer to the Court by request of a phone conference. The parties further stipulate that such motions marked "Confidential – Subject to Protective Order" shall be received and maintained by the Clerk of Court under seal until such time as the Court orders otherwise.

Respectfully submitted,

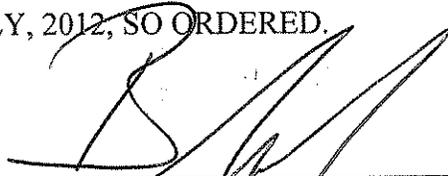
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IT IS ON THIS 24 DAY OF JULY, 2012, SO ORDERED.



BRIAN J. MARTINOTTI, J.S.C.