

REED SMITH LLP

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*Attorney for Defendants,
Allergan, Inc. and Allergan USA, Inc.*

IN RE ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCTS LIABILITY LITIGATION

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

MCL NO. 634

MASTER DOCKET NO. BER-L-5064-20

**STIPULATION AND [PROPOSED]
ORDER RE INTERIM
CONFIDENTIALITY AGREEMENT**

Defendants Allergan, Inc. and Allergan USA, Inc. (together "Allergan") and Plaintiffs, by and through their undersigned counsel, hereby stipulate as follows:

Allergan has agreed to produce to Plaintiffs in the above-captioned case certain documents in advance of a Protective Order as a courtesy. Allergan asserts that these documents consist of or contain confidential and sensitive financial data, technical information, trade secrets, proprietary or nonpublic commercial information, information involving privacy interests, and other commercially and/or competitively sensitive information of a nonpublic nature, or received on a confidential basis; and

The parties are finalizing entry of a Protective Order in this action based on the Amended Protective Order entered by Judge Joseph Dickson in the MDL, but in the interim want to facilitate production of these documents;

The parties therefore agree that:

FILED
SEP 24 2020
RACHELLE L. HARZ
J.S.C.

1. These documents produced by Allergan pursuant to this Agreement shall be deemed "Confidential" and shall not be disclosed by Plaintiffs or their counsel of record to anyone whatsoever until such time that the Court has entered a Protective Order.

2. These documents produced by Allergan and stamped "Confidential" pursuant to this Agreement shall immediately become subject to the terms and conditions of the Protective Order entered by the Court.

Stipulated and agreed to this 23rd day of September, 2020:

**MAZIE SLATER KATZ
& FREEMAN LLC**

s/ Adam M. Slater
By: Adam M. Slater
103 Eisenhower Pkwy
Roseland, New Jersey 07068

Attorneys for Plaintiffs

REED SMITH LLP

s/ Melissa A. Geist
By: Melissa A. Geist
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Attorneys for Defendants

IT IS on this 24th day of September, 2020, **SO ORDERED.**



HON. RACHELLE L. HARZ, J.S.C.