

**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

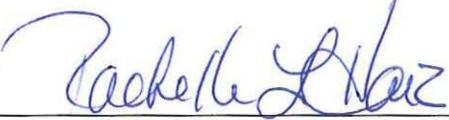
*Attorneys for Plaintiffs*

**REED SMITH LLP**

s/ Melissa A. Geist  
By: Melissa A. Geist  
506 Carnegie Ctr., Suite 300  
Princeton, New Jersey 08540

*Attorneys for Defendants*

IT IS on this 24<sup>th</sup> day of September, 2020, **SO ORDERED.**

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