IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

COT'N WASH, INC., et. al.,	)	
	)	
Plaintiffs,	)	
v.	)	**Civ. No. 12-650-SLR**
	)	
HENKEL CORPORATION, et al.,	)	
	)	
Defendants.	)	
COT'N WASH, INC., et al.	)	
	)	
Plaintiffs,	)	
v.	)	**Civ. No. 12-651-SLR**
	)	
THE SUN PRODUCTS CORPORATION	)	
	)	
Defendant.	)	

JOINT STATUS REPORT AND IDENTIFICATION OF DISPUTES

The parties jointly submit this Status Report and Identification of Disputes in preparation for the Discovery Conference to be held by Judge Robinson in Courtroom 4B at 4:30PM on Thursday, January 24, 2013.

I. Status

Currently, Plaintiffs Cot'n Wash, Inc. and Big 3 Packaging, LLC (collectively "Plaintiffs") propounded discovery upon Henkel Corporation, The Dial Corporation, and Henkel Consumer Goods Inc. (collectively "Henkel"), The Sun Products Corporation ("Sun"), and some third-party manufacturers and former employees. Similarly, Henkel and Sun have propounded discovery upon Plaintiffs.

Plaintiffs, Sun, and Henkel have begun their document productions. Further, Plaintiffs, Sun, and Henkel proposed search terms for electronic searching and anticipate reaching an agreement promptly.

II. Disputes

The parties may raise the following issues with the Court if they are unable to resolve the issues prior to the Discovery Conference:

1. The number of depositions, and how depositions are to be allocated between parties;
2. Limits on Rule 30(b)(6) Depositions;
3. Limits on Depositions of Plaintiffs on common issues;
4. Limits on Inventor Depositions;
5. Whether to bifurcate damages and willfulness;
6. The status of the Protective Order; and
7. Whether to extend the document production cutoff.

ROSENTHAL, MONHAIT & GODDESS, P.A.

/s/ Jessica Zeldin

Jessica Zeldin (Del. Bar No. 3558)
919 Market Street, Suite 1401
Wilmington, DE 19801
(302) 656-4433
jzeldin@rmgglaw.com
Attorneys for Cot'N Wash, Inc. and Big 3 Packaging, LLC

OF COUNSEL:

Michael J. Bonella
Tod A. Kupstas
Jenna Pellecchia
KESSLER TOPAZ MELTZER & CHECK LLP
280 King of Prussia Road
Radnor, PA 19087
(610) 667-7706
mbonella@ktmc.com
tkupstas@ktmc.com
jpellecchia@ktmc.com
Attorneys for Cot'N Wash, Inc. and Big 3 Packaging, LLC

PRICKETT, JONES & ELLIOTT, PA

/s/ J. Clayton Athey

J. Clayton Athey (Del. Bar No. 4378)
Laina M. Herbert (Del. Bar No. 4717)
1310 King Street
Wilmington, DE 19899
jcathey@prickett.com
lmherbert@prickett.com
(302) 888-6547
Attorney for Defendants Henkel Corporation, The Dial Corporation and Henkel Consumer Goods Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
Attorney for The Sun Products Corporation

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