IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORTHOPHOENIX, LLC, Plaintiff, v. STRYKER CORPORATION, *et al.*, Defendant and Counterclaim Plaintiff v. ORTHOPHOENIX LLC, IP NAVIGATION GROUP, LLC, MEDTRONIC, INC., Counterclaim Defendants.	)	C.A. No. 13-1628-LPS

STIPULATION AND [PROPOSED] ORDER

WHEREAS, the Court heard oral argument on Counterclaim Defendant Medtronic, Inc's Motion to Enforce Settlement Agreement (D.I.274) on September 26, 2016, the briefing of which contained reference to the parties' confidential information that had been filed under seal by Counterclaim Defendant Medtronic, Inc. and Plaintiff/Counterclaim Defendant Orthophoenix LLC;

WHEREAS, during the hearing, Defendant/Counterclaim Plaintiff Stryker requested that the hearing and related transcript be sealed pursuant to the Protective Order due to the disclosure during the hearing of confidential information and the Court granted Stryker's request after no party objected, asking the parties to submit proposed redactions to the transcript (the "Hearing Transcript") (Ex. A at 4:2-24);

WHEREAS, after reviewing the Hearing Transcript, Stryker, Orthophoenix LLC and IP Navigation Group, LLC identified confidential information and have prepared a redacted version of the transcript pursuant to the Court's order, which includes minimal redactions that are limited to the parties' confidential information including information relating to confidential agreements between the parties (*see* Ex. A (redacted transcript));

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Stryker, Orthophoenix LLC and IP Navigation Group, LLC, through their undersigned counsel and subject to the approval of the Court, that:

1. The original, unredacted Hearing Transcript shall remain under seal; and

2. Any publicly available copies of the Hearing Transcript, including, but not limited to, transcripts that are or will be available by remote electronic access, shall be redacted consistent with the redactions proposed in Exhibit A hereto.

Dated: November 18, 2016

BAYARD, P.A.

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SO ORDERED this ___ day of November, 2016.

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HONORABLE LEONARD P. STARK
CHIEF JUDGE, U.S.D.C.

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