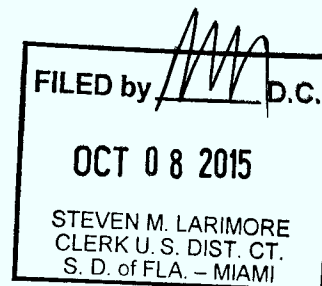


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 0:15-CV-61631-JIC

AMGEN, INC. and AMGEN	)
MANUFACTURING LIMITED,	)
	)
Plaintiffs,	)
	)
v.	)
	)
APOTEX INC. and APOTEX CORP.	)
	)
Defendants.	)
_____	)



**JOINT MOTION TO FILE STIPULATION UNDER SEAL**

Plaintiffs Amgen Inc. and Amgen Manufacturing Limited (collectively, “Amgen”), and Defendants Apotex Inc. and Apotex Corp., by and through undersigned counsel and pursuant to Local Rule 5.4, L.R. S.D. Fla., move the Court for the entry of an Order permitting the parties to file the Joint Stipulation Regarding Commercialization and Schedule (the “Joint Stipulation”) that is referenced in the parties’ Joint Motion to Set Briefing Schedule and Hearing on Amgen’s Forthcoming Motion for Preliminary Injunction (ECF No. 37) under seal.

The Joint Stipulation provides, *inter alia*, that Apotex will not “commercially manufacture, use, offer to sell or sell within . . . or import into the United States its biosimilar pegfilgrastim product in the United States through” an agreed-upon date. The date itself has not been disclosed in the public file because it constitutes highly confidential and commercially sensitive business information which, if disclosed to the public, would likely result in significant economic and competitive injury to Apotex. The parties respectfully submit that these circumstances justify the filing of the Joint Stipulation under seal.

Along with this Motion, and as required by Local Rule 5.4, the parties are conventionally filing the Joint Stipulation in a separate envelope marked "SEALED DOCUMENT" with the case number and style of the case on the outside.

The parties request that the Joint Stipulation be kept under seal until final disposition of this action, including any appeal, at which time the Joint Stipulation may be destroyed or returned to undersigned counsel.

WHEREFORE, Plaintiffs Amgen Inc. and Amgen Manufacturing Limited and Defendants Apotex Inc. and Apotex Corp. respectfully request that the Court enter an Order permitting the Joint Stipulation Regarding Commercialization and Schedule to be filed under seal.

Respectfully submitted,

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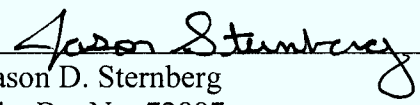
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*Attorneys for Defendants Apotex Inc. and  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 8, 2015, I conventionally filed the foregoing with the Clerk of the Court and that a true and correct copy was served via electronic mail on all counsel of parties of record.

By:   
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