

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: PHILIPS RECALLED CPAP, BI-  
LEVEL PAP, AND MECHANICAL  
VENTILATOR PRODUCTS LITIGATION**

Master Docket: Misc. No. 21-1230

MDL No. 3014

This Document Relates to: *All Actions*

**STIPULATION REGARDING STIPULATED PROTECTIVE ORDER**

WHEREAS, Plaintiffs and Defendants Philips RS North America, LLC f/k/a Respironics, Inc., Koninklijke Philips N.V., Philips North America LLC, Philips Holding USA, Inc., and Philips RS North America Holding Corporation (collectively “Philips”) previously submitted, and the Court approved, a Stipulated Protective Order (ECF No. 104) and 502(d) Order (ECF No. 105);

WHEREAS, Defendants Wm. T. Burnett Foam LLC, Wm. T. Burnett & Co., Wm. T. Burnett Management, Inc., Wm. T. Burnett Holding LLC, Wm. T. Burnett Fiber LLC, and Wm. T. Burnett IP LLC (collectively “Burnett”) were not signatories to those stipulations, but wish to abide by and benefit from their terms.

THEREFORE, Plaintiffs, Philips, and Burnett hereby agree and stipulate that the terms of the Stipulated Protective Order (ECF No. 104) and 502(d) Order (ECF No. 105) shall apply in full to Burnett for the purposes of this litigation.

**IT IS SO ORDERED.**

Dated: April 1, 2022

/s/ JOY FLOWERS CONTI  
Joy Flowers Conti  
Senior United States District Judge

**SO STIPULATED AND AGREED.**

DATED: March 29, 2022

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