

DOCKET NO. CV 03 0083298 S (X07)

STATE OF CONNECTICUT,	:	SUPERIOR COURT
<i>PLAINTIFF</i>	:	
	:	COMPLEX LITIGATION
V.	:	DOCKET AT TOLLAND
	:	
GLAXO SMITHKLINE, P.L.C.,	:	
GLAXO WELLCOME, INC., AND	:	
SMITHKLINE BEECHAM CORP.	:	
<i>DEFENDANTS</i>	:	JUNE 10, 2004

**MOTION FOR ENTRY OF CONFIDENTIAL PROTECTIVE ORDER**

Pursuant to Practice Book § 13-5, the plaintiff, State of Connecticut, hereby moves that the Court enter a protective order to govern the exchange of protected confidential information, ranging from proprietary trade secrets to confidential patient medical information. The parties in the four Average Wholesale Price (“AWP”) cases pending before this Court have conferred on the form and substance of such a confidential protective order since March 9, 2004. At this juncture, the parties have been unable to reach agreement on a small number of issues. Thus, the plaintiff respectfully requests that the Court consider the issues where the parties disagree on the form or substance of a confidential protective order, and enter the confidential protective order in the form proposed by the State.

A memorandum in support of this motion, Practice Book §§13-8(b), 13-10(c) Affidavit, and proposed Confidential Protective Order accompany this motion.

PLAINTIFF,  
STATE OF CONNECTICUT  
RICHARD BLUMENTHAL  
ATTORNEY GENERAL

BY:

\_\_\_\_\_  
Clare E. Kindall  
Assistant Attorney General  
Juris No. 415004  
55 Elm Street, P.O. Box 120  
Hartford, CT 06141-0120  
Tel: (860) 808-5020  
Fax: (860) 808-5347  
Email: [Clare.Kindall@ctag.state.ct.us](mailto:Clare.Kindall@ctag.state.ct.us)

**CERTIFICATION**

I hereby certify that true and accurate copies of the foregoing Motion for Entry of Confidential Protective Order were served by first-class mail, postage prepaid, this 10<sup>th</sup> day of June, 2004, to:

Katherine A. Burroughs  
Robert E. Grady  
Dechert LLP  
90 State House Square  
Hartford, CT 06103-3702

Thomas A. Lee, II  
Dechert LLP  
4000 Bell Atlantic Tower  
1717 Arch Street  
Philadelphia, PA 19103-2793

Frederick G. Herold  
Dechert LLP  
975 Page Mill Road  
Palo Alto, CA 94304-1013

\_\_\_\_\_  
Clare E. Kindall  
Assistant Attorney General