

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

\_\_\_\_\_)  
IN RE: \_\_\_\_\_)  
VITAMINS ANTITRUST LITIGATION \_\_\_\_\_)  
\_\_\_\_\_)  
This Document Relates to: \_\_\_\_\_)  
\_\_\_\_\_)  
All Actions \_\_\_\_\_)  
\_\_\_\_\_)

M.D.L. No. 1285

Misc. No. 99-0197 (TFH)

**FILED**

**APR 25 2001**

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

**TFH**

STIPULATION AND ~~PROPOSED~~ ORDER

IT HEREBY STIPULATED AND AGREED by and between the parties in the above-captioned actions that:

(1) Paragraph One of the Protective Order dated November 3, 1999 in the above-captioned actions shall be amended to read as follows: "All information produced or discovered in this litigation, regardless whether designated confidential, shall be used solely for the prosecution or defense of this litigation, unless that information has become publicly available without a breach of the terms of this Order, except that the use in DCV Holdings, Inc. v. ConAgra, Inc., et al., C.A. No. 98C-06-301 (Del. Sup. Ct.) ("Delaware Action"), of (i) documents produced in this Action by DCV, Inc., DuCoa, L.P., DuPont, or ConAgra, or otherwise designated as Confidential Information in this Action in whole or in part by DCV, Inc., DuCoa, L.P., DuPont, or ConAgra, or any of those entities' affiliates and (ii) deposition testimony or statements in this Action provided by former or current employees or representatives of DCV, Inc., DuCoa, L.P. (or its predecessor), DuPont, or ConAgra, shall not be a violation of this Order."

(2) With respect to any documents produced or deposition testimony or statements provided in the Delaware Action, which were designated as Confidential in whole or in part in the Delaware Action, the parties in this Action agree that the use of any such materials in this Action

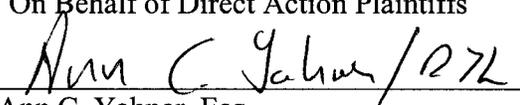
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shall be governed by the Protective Orders, as amended, in effect both in this Action and in the Delaware Action.

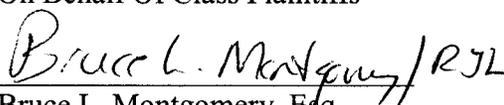
Dated: 4/20/2001

  
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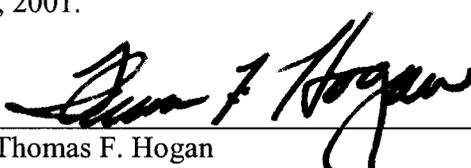
On Behalf of Direct Action Plaintiffs  
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On Behalf Of Defendants

SO ORDERED this 23 day of April, 2001.

  
Thomas F. Hogan  
United States District Judge

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