IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	Civil Action No.: 1:03CV01923
GENERAL ELECTRIC COMPANY,	)	Filed: September 16, 2003
and	)	
INSTRUMENTARIUM OYJ,	)	
Defendants.	)	

STIPULATED MOTION OF THE PARTIES TO PLACE EXHIBIT 1 TO PLAINTIFF'S PROPOSED FINAL JUDGMENT AND EXHIBIT A (PART 2) TO THE PARTIES' HOLD SEPARATE STIPULATION AND ORDER UNDER SEAL

By this stipulated Motion, plaintiff and defendants move this Court pursuant to Local Court Rule 5.1(j) and Fed. R. Civ. P. 26(c) for an Order permitting the United States to file under seal Exhibit 1 to the plaintiff's proposed Final Judgment, which is also attached as Exhibit A (Part 2) to the parties' Hold Separate Stipulation and Order.

Exhibit 1 to the plaintiff's proposed Final Judgment is the entire text of Schedule 1, including Annexes 1-4, of the Commitments entered into by defendants with the European Commission regarding the divestiture of Spacelabs, which were approved by the European Commission on September 2, 2003. Exhibit 2 of the plaintiff's proposed Final Judgment, which is also attached as Exhibit A (Part 3) to the parties' Hold Separate Stipulation and Order, provides a nonconfidential version of Schedule 1.

Exhibit 1 provides a detailed description of the Spacelabs business, which defendants are ordered by the proposed Final Judgment to divest. Exhibit 1 includes highly confidential

information such as customer lists and supply agreements. Revealing these details about the Spacelabs business is not necessary for public comment on the Final Judgment, nor for the Court's assessment as to whether the proposed Final Judgment is in the public interest pursuant to the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16. Exhibit 2 of the proposed Final Judgment, which provides a nonconfidential version of Schedule 1, is not filed under seal.

Therefore, the parties move for an Order in the form attached hereto permitting Exhibit 1 to the proposed Final Judgment, also attached as Exhibit A (Part 2) of the Hold Separate Stipulation and Order, to be filed and maintained under seal.

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

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Dated: September 16, 2003.

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. **GENERAL ELECTRIC COMPANY**, and **INSTRUMENTARIUM OYJ**, Defendants.	Civil Action No.: Filed:

ORDER TO PLACE EXHIBIT 1 TO THE FINAL JUDGMENT AND EXHIBIT A (PART 2) TO THE HOLD SEPARATE STIPULATION AND ORDER UNDER SEAL

Good cause having been shown and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Local Rule 106(j), the Court ORDERS as follows:

The documents filed as Exhibit 1 to the proposed Final Judgment, also attached as Exhibit A (Part 2) to the Hold Separate Stipulation and Order, in this matter shall be placed under seal by the Clerk of the Court, and shall not be made part of the public record for any purposes.

It is SO ORDERED this ___ day of September 2003.

_____
United States District Judge