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25 Attorneys for Plaintiff
26 MP NEXLEVEL OF CALIFORNIA, INC.
27 And Third-Party Defendant
28 WESTERN SURETY COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

MP NEXLEVEL of California, Inc.,
MP Nexlevel,
v.
CVIN, LLC dba VAST NETWORKS,
CALAVERAS COMMUNICATIONS
COMPANY, SEBASTIAN
ENTERPRISES, INC., VOLCANO
COMMUNICATIONS COMPANY,
STAGELINE COMMUNICATIONS,
INC., THE PONDEROSA TELEPHONE
COMPANY, SIERRA TEL

Case No. 1:14-cv-00288-LJO-GSA
**STIPULATION RE DISCOVERY
DISAGREEMENTS BETWEEN
PLAINTIFF MP NEXLEVEL OF
CALIFORNIA, INC. AND DEFENDANT
CVIN, LLC**

[Discovery Motion – L.R. 251]
Complaint Filed February 28, 2014
Trial Date: July 25, 2017

**STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP
NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC**

1 COMMUNICATIONS GROUP,
2 VARNET, INC., CAL-ORE
3 TELEPHONE CO., DUCOR
4 TELEPHONE COMPANY,
5 CONSOLIDATED COMMUNICATIONS
6 HOLDINGS, INC., MOHAVE
7 INVESTMENT, LLC, SIERRA TEL
8 BROADBAND, SUREWEST FIBER
9 VENTURES, LLC, VARCOMM, INC,
10 VOLCANO TELECOM, INC. and DOES
11 1 to 100,

12 Defendants.

13 CVIN, LLC,

14 Counter and Cross-Claimant,

15 v.

16 MP NEXLEVEL OF CALIFORNIA, INC,
17 WESTERN SURETY COMPANY, ROES
18 1 through 50, inclusive,

19 Cross-Defendants,

20 MP NEXLEVEL OF CALIFORNIA,
21 INC.,

22 Third-Party Plaintiff,

23 v.

24 APEX DIRECTIONAL DRILLING, LLC;
25 AND JK COMMUNICATIONS &
26 CONSTRUCTION, INC. dba KLEVEN
27 CONSTRUCTION, GEORGE
28 VALENTINEZ, dba ALLIED PLUS LOW
29 VOLTAGE

30 Third-Party Defendants.

31
32
33 WHEREAS, a dispute exists between Plaintiff MP Nexlevel of California, Inc. (“MPN”) and Defendant CVIN, LLC (“CVIN”) regarding the sufficiency of the efforts undertaken by CVIN to date to search for and produce responsive, relevant emails and CVIN’s compliance with the Stipulation for Preserving and Producing Electronic Evidence (the “ESI Protocol”);

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38 **STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC**

1 WHEREAS, CVIN conducted electronic searches of its records to identify and produce
2 responsive, non-privileged emails in response to MPN’s discovery requests, employing certain
3 search terms (the “Prior CVIN Productions”);

4 WHEREAS, MPN has challenged the sufficiency of CVIN’s search terms and search
5 efforts underlying and relating to the Prior CVIN Productions, and requested that CVIN conduct
6 supplemental searches of its emails utilizing additional search terms identified by MPN and make
7 a supplemental production in accordance with the ESI Protocol;

8
9 WHEREAS, counsel for MPN and CVIN participated in informal discovery conferences
10 with the Court on December 18, 2015 and January 13, 2016, and have separately engaged in meet
11 and confer communications, in an effort to resolve the disputes between them relating to the Prior
12 CVIN Productions without resort to formal motion practice;

13 WHEREAS, during the January 13, 2016 informal discovery conference CVIN disclosed
14 to MPN and the Court that pst (email) files (the “Missing PST Files”) that should have been
15 included in the materials provided by CVIN to its counsel for review and production were
16 unintentionally omitted from the corpus of documents heretofore reviewed for responsiveness and
17 production to MPN, necessitating a supplemental search and production of responsive emails from
18 the Missing PST Files;

19
20 WHEREAS, following the January 13, 2016 informal discovery conference and with the
21 benefit of the Court’s guidance provided therein, counsel for CVIN and MPN have met and
22 conferred regarding the scope and timing of supplemental searches and a supplemental production
23 by CVIN in accordance with the ESI Protocol, including the collection and production by CVIN
24 of custodian and “other custodian” information; and

25 WHEREAS, MPN and CVIN have agreed to resolve their present discovery disagreements
26 in accordance with the terms set forth herein,

27
28 **STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP
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1 NOW THEREFORE, MPN and CVIN stipulate and agree as follows:

2
3 1. CVIN shall review and produce the responsive emails contained within the Missing
4 PST Files (hereinafter “Supplemental Email Production”). The Missing PST Files, and
5 the corresponding responsive emails, will be de-duplicated against the emails
6 previously produced by CVIN. CVIN represents that the Missing PST Files are
7 comprised of email searches conducted using the CVIN search terms attached hereto as
8 Exhibit A and performed at the CVIN server level; that this prior search did not capture
9 “Custodian” and “Other Custodian” information; and that “Custodian” and “Other
10 Custodian” information cannot be extracted from the Missing PST Files.

11 Consequently, the production of responsive communications from the Missing PST
12 Files will indicate that the “Custodian” is the CVIN Email Server. The emails subject
13 to the Supplemental Email Production shall generally include those responsive, non-
14 privileged emails generated from and after January 1, 2010 including, without
15 limitation, (1) emails generated between February 21, 2014 and June 19, 2014, but only
16 to the extent those emails relate to the completion of Segment 19 of the Project
17 following MPN’s termination, (2) emails generated between February 21, 2014 and
18 May 30, 2015, but only to the extent those emails relate to the completion of Segment
19 27 of the Project following MPN’s termination, (3) any alleged defects in the work
20 performed by MPN and/or any MPN subcontractors, and (4) any alleged damages
21 claimed by CVIN against MPN.

22 2. CVIN will conduct a supplemental search of all emails in its possession, custody or
23 control (the “Supplemental Email Search”). The emails subject to the Supplemental
24 Email Search shall generally include those emails generated from and after January 1,
25 2010 including, without limitation, (1) emails generated between February 21, 2014
26 and June 19, 2014, but only to the extent those emails relate to the completion of
27 Segment 19 of the Project following MPN’s termination, (2) emails generated between

28 **STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP
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1 February 21, 2014 and May 30, 2015, but only to the extent those emails relate to the
2 completion of Segment 27 of the Project following MPN's termination, (3) any
3 alleged defects in the work performed by MPN and/or any MPN subcontractors, and
4 (4) any alleged damages claimed by CVIN against MPN. CVIN represents that the
5 Supplemental Email Search will be run against the entirety of CVIN's email database
6 retrieved at the custodian level. Before conducting the Supplemental Email Search,
7 CVIN will run a de-duplication process to identify email communications previously
8 produced by CVIN, capture and produce to MPN "Custodian" and "Other Custodian"
9 data for all such previously produced email communications, and exclude the
10 previously produced email communications from the Supplemental Email Search. All
11 remaining email communications will then be searched utilizing the MPN search
12 terms attached hereto as Exhibit B. CVIN shall conduct the Supplemental Email
13 Search and produce responsive email communications in full compliance with the ESI
14 Protocol, including collecting and producing "Custodian," "Other Custodian" and other
15 information and metadata required by the ESI Protocol (the "MPN Email Search
16 Production"). CVIN and MPN shall cooperatively work together to establish an agreed
17 upon search protocol for the Supplemental Email Search; provided, however, that any
18 such effort shall not relieve CVIN of the obligation to complete the searches required
19 and produce documents in accordance with the ESI Protocol by the deadlines specified
20 herein.

21
22 3. CVIN shall produce the Supplemental Email Production and MPN Email Search
23 Production on a rolling basis. CVIN shall complete the Supplemental Email
24 Production by no later than March 25, 2016, and the MPN Email Search Production by
25 no later than April 29, 2016.

26 4. MPN and CVIN preserve all rights with respect to privilege objections and
27 confidentiality issues under the terms of the case Protective Order.

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1 5. MPN preserves its right to later challenge the sufficiency of CVIN's production of
2 emails pursuant to this Stipulation, by initiating the required meet and confer, and
3 following any Court Orders or other directions on the procedures for raising and
4 resolving discovery issues with the Court. However, said challenge will not be based
5 on the adequacy of the search terms – either those used by CVIN (Exhibit A) or
6 submitted by MPN (Exhibit B) – or CVIN's searches and productions, to the extent
7 said searches and production comply with the ESI Protocol and this Stipulation.
8 Further, nothing herein shall limit MPN's right to challenge the scope of CVIN's
9 production of documents and the sufficiency of CVIN's discovery responses in this
10 matter.

11 **SO STIPULATED:**

12
13 Dated: February 29, 2016

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NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC**

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Dated: February 25, 2016

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*Attorneys for
CVIN, LLC*

ORDER

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The foregoing Stipulation of the parties is hereby approved, and the items listed in Paragraphs 1-5 of the Stipulation above shall be the Order of the Court.

IT IS SO ORDERED.

Dated: March 2, 2016

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE

EXHIBIT A

CVIN SEARCH TERMS

MP Nexlevel Email Search Terms														
RELATIVE SEGMENT NUMBER	8	10	12	13	14	15	18	19	21	22	25	26	27	30
Amador									x					
American River											x			
BLM											x			
BNSF	x	x	x			x	x							
Board	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Bureau									x					
Caltel									x					
Caltrans		x	x	x	x	x	x	x	x	x	x	x	x	x
Ceres								x						
CID				x		x								
Coloma											x			
Columbia								x						
Cool											x			
Corcoran				x		x								
COS			x											
CSLC								x						
CVFPB	x	x	x	x	x	x	x							x
Delano										x				
Denair	x													
Ducor					x					x				
Earlilmart										x				
El Dorado											x	x		
El Dorado COE											x			
El Dorado Library											x			
Farmersville				x										
Fiddletown									x					
Fish" "Game											x	x		
Garden Valley											x			
Genesee			x	x										
Georgetown											x			
gocomp1	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Golden State								x						
Grass Valley													x	
Hanford			x											
Hughson							x							
Kern										x				
Kings			x			x								
Kings COE						x								
Kings OPS			x											
Lemoore						x								
Level 3			x							x				
Lindsay					x									
M&ET							x							
Madera		x												
Madera COE		x												
Madera OPS		x												
MID		x												
Modesto							x							
MP Nexlevel	x	x	x	x	x	x	x	x	x	x	x	x	x	x
MPN	x	x	x	x	x	x	x	x	x	x	x	x	x	x
mpnexlevel	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Nevada														x
Nevada COE														x
Nevada Library														x
Placerville											x			
Plymouth								x						
Porter					x									
Porterville					x									
Railamerica				x	x	x				x				
Reclamation								x			x	x		
Red Mule									x					
San Joaquin		x	x	x	x		x							x
Sandrini										x				
Santa Fe	x					x								
seg X	x	x	x	x	x	x	x	x	x	x	x	x	x	x
segment X	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Sequoias			x											
Sierra Northern Railway								x						
SVAPCD		x		x	x		x							x
SVRR			x	x	x	x				x				
Sonora								x						
Stanislaus	x						x							
Strathmore					x									
Sturtz	x	x	x	x	x	x	x	x	x	x	x	x	x	x
TCOE			x	x				x						
TID	x						x							
Time Warner					x									
tony	x	x	x	x	x	x	x	x	x	x	x	x	x	x
tony.sturtz	x	x	x	x	x	x	x	x	x	x	x	x	x	x
TID								x						
Tulare			x	x	x					x				x
Tulare COE			x	x										
Tulare Hub					x									
Tulare Library					x									
Tulare OPS					x									
Tuolumne								x						
Tuolumne COE								x						
Turlock	x													
UPRR		x	x	x	x	x				x				x
Visalia			x	x										
Volcano									x					
Water	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Waukena														x
West Hills							x							
Westhills							x							
Wiltel		x		x						x				
Zayo		x			x									

STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC

EXHIBIT B

MPN REQUESTED SEARCH TERMS

Term	Terms and Strings ^{1,2}	Methodology	
MPN/MPN Personnel:			¹ Terms without quotation marks or Boolean qualifiers should be run as standalone terms, no stemming, character strings
MPN	MPN	No Stemming, Character String	
Coby Hanson, Coby, chanson	"Coby Hanson", Coby, chanson	No Stemming, Character String	
Travis Wilde, twilde, Travis, Wilde	"Travis Wilde", twilde, Travis, Wilde	No Stemming, Character String	² Each term or string, separated by a comma in the Terms and Strings column, should be run as a separate term
Louis George Menard	"Louis George Menard", lmenard	No Stemming, Character String	
Rob Pribyl	"Rob Pribyl", rpribyl, pribyl	No Stemming, Character String	
Linda Sturtz	"Linda Sturtz", Linda, lsturtz	No Stemming, Character String	
Curtis Rykhus	"Curtis Rykhus", crykhus, rykhus	No Stemming, Character String	
Mike Aydtt	"Mike Aydtt", mikea	No Stemming, Character String	
Richard (Dick) Sanfilippo	"Richard Sanfilippo", "Dick Sanfilippo", rsanfilippo, sanfilippo	No Stemming, Character String	
Engineering/Consulting Companies:			
AECOM	AECOM, aecom.com	No Stemming, Character String	
Carlton Engineering	"Carlton /2 Engineering", Carlton	No Stemming, Character String	
CCI Systems	"CCI /2 Systems", CCI	No Stemming, Character String	
Compliance One	"Compliance /2 One", "gocompl.com"	No Stemming, Character String	
Compliance Solutions	"Compliance /3 Solutions"	No Stemming, Character String	
Engineering Associates	"Engineering /2 Associates", engineeringassociates.com, EA	No Stemming, Character String	
Gateway Engineering, gatewayeng	"Gateway Engineering", "Gateway /2 Eng!", gatewayeng, gateway	No Stemming, Character String	

STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC

1	GrassRoots	GrassRoots, grassrotsenv.com	No Stemming, Character String	
2	K&B Engineering	"K&B Engineering", K&B	No Stemming, Character String	
3	Lane Engineering	"Lane /2 Engineering"	No Stemming, Character String	
4	LightRiver	LightRiver	No Stemming, Character String	
5	Yamabe	Yamabe	No Stemming, Character String	
6	Almendariz	Almendariz, almendarizconsult ing.com	No Stemming, Character String	
8	Bennett Trenchless	"Bennett /2 Trenchless", bennettrenchless.c om, bennett	No Stemming, Character String	
10	Subcontractors/ Vendors:			
11	Accu Bore	"Accu /2 Bore"	No Stemming, Character String	
12	Alvarion	Alvarion	No Stemming, Character String	
13	Apex	Apex	No Stemming, Character String	
14	Baileys Trenchless	"Baileys /2 Trenchless", Baileys	No Stemming, Character String	
16	McKuinn (William/Bill McKuinn, McKuinn Pipeline)	McKuinn, "McKuinn /3 Pipeline", "William McKuinn", "Bill McKuinn"	No Stemming, Character String	
18	Bridge Masters, bridgemasters	"Bridge Masters", bridgemasters	No Stemming, Character String	
19	Capitol Barricade	"Capitol Barricade", capitalbarricade, capitolbarricade	Fuzzy 1, No Stemming, Character String	
21	Cenvalley, Central Valley Engineering & Asphalt	Cenvalley, "Central Valley Engineering & Asphalt"	No Stemming, Character String	
23	Doumit	Doumit	No Stemming, Character String	
24	Downing Diversified	"Downing Diversified", Downing	No Stemming, Character String	
26	EDX Wireless	EDX	No Stemming, Character String	
27	J. Fletcher Creamer, JFC, JCF	"Fletcher /2 Creamer", jfcson.com, JFC,	No Stemming, Character String	

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		JCF		
1	Henkels & McCoy	"Henkels /3 McCoy", henkels.com, henkels	No Stemming, Character String	
2				
3	Horizon Underground	"Horizon Underground"	No Stemming, Character String	
4	JB Excavating	"JB Excavating"	No Stemming, Character String	
5	JK Communications, Kleven, klevcon	"JK /3 Communications", Kleven, klevcon	No Stemming, Character String	
6				
7	KRC Safety, krksafey	"KRC Safety", krksafey	No Stemming, Character String	
8	Nuvision, nu-vision	Nuvision, nu-vision	No Stemming, Character String	
9	Patriot Environmental	"Patriot Environmental", patriot	No Stemming, Character String	
10				
11	Ventura Directional, venturadrilling	"Ventura Directional", venturadrilling, ventura	No Stemming, Character String	
12	Youngdahl	Youngdahl	No Stemming, Character String	
13				
14	A-D Technologies, Arnco	"A-D Technologies", Arnco	No Stemming, Character String	
15	SCWW	SCWW	No Stemming, Character String	
16	Sierratrafficmarkings	Sierratrafficmarkings	No Stemming, Character String	
17	Usan	Usan	No Stemming, Character String	
18	Uscsupply	Uscsupply	No Stemming, Character String	
19	Inspectors/Inspection Companies:			
20	ITC Service Group, ITC, callitic	ITC, callitic	No Stemming, Character String	
21				
22	Addakid	Addakid	No Stemming, Character String	
23	Iseger	Iseger, "Bryon Iseger"	No Stemming, Character String	
24	Hanley, drhanley19@aol.com	drhanley19, "Dennis Hanley", hanley	No Stemming, Character String	
25	Lovelady, Fiberoptikid	Lovelady, Fiberoptikid, "Jeff Lovelady"	No Stemming, Character String	
26				
27	Bill Brown, ohiobill	ohiobill, ohiobil	No Stemming, Character String	

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1	Paul Newman	"Paul Newman", newmanpaul33	No Stemming, Character String	
2	Midgley	Midgley, "Harry Midgley"	No Stemming, Character String	
3	Veresh	Veresh, "Jeff Veresh"	No Stemming, Character String	
4	Mosher	Mosher, "John Mosher"	No Stemming, Character String	
5	Buckley	Buckley	No Stemming, Character String	
6	Chamberlain	rchamberlain, "Ron Chamberlain", chamberlain	No Stemming, Character String	
7				
8	Runge	Runge, "Mike Runge"	No Stemming, Character String	
9	Jerry Berg, Gerald Berg	"Jerry Berg", "Gerald Berg"	No Stemming, Character String	
10	Jesse Day, jessday	"Jesse /2 Day", jessday, jessday@foothill.n et	No Stemming, Character String	
11				
12	Vali Cooper, valicooper	"Vali Cooper", valicooper, "vail cooper"	No Stemming, Character String	
13	Rickard, jprikard	jprikard, "Jason Rickard", rickard	No Stemming, Character String	
14	Hitchko	Hitchko, "Kevin Hitchko"	No Stemming, Character String	
15				
16	Shayne Pope, shaynepope	"Shayne /2 Pope", Shayne, shaynepope	No Stemming, Character String	
17	Matranga	Matranga, "Steve Matranga"	No Stemming, Character String	
18	Kidd, stacy.kidd@gmail .com	stacy.kidd, "Stacie Kidd", "Stacy Kidd"	No Stemming, Character String	
19				
20	Sauer	Sauer, csauer	No Stemming, Character String	
21	Eric Cate, eric.ca8@gmail.c om	eric.ca8, "Eric Cate"	No Stemming, Character String	
22	Kevin Guillory, klguillory@aol.co m	klguillory, "Kevin Guillory"	No Stemming, Character String	
23				
24	Terri King, tkinggirl@gmail.c om	tkinggirl, "Terri King"	No Stemming, Character String	
25	Terrial King, tkingguy@gmail.c om	tkingguy, "Terrial King"	No Stemming, Character String	
26				
27	Allen LeHew, allen.tlehew@gm	allen.tlehew, "Allen /3 LeHew"	No Stemming, Character String	

28 **STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP
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	ail.com		
1	Sam Lewis, slewis.jr14@gmail.com	slewis.jr14, "Sam Lewis"	No Stemming, Character String
2			
3	Mike Rostad, mrostad@charter.net	mrostad, "Mike Rostad"	No Stemming, Character String
4	CVIN Member Entities/Related Entities:		
5			
6	Cal Ore, calore (domain name)	"Cal Ore", calore	No Stemming, Character String
7	Calaveras	Calaveras	No Stemming, Character String
8	CENIC	CENIC	No Stemming, Character String
9	Consolidated Communications	"Consolidated Communications"	No Stemming, Character String
10	Mohave Investment	"Mohave Investment"	No Stemming, Character String
11	Peak to peak	"Peak to Peak", peaktopeaktelcom	No Stemming, Character String
12	Ponderosa	Ponderosa	No Stemming, Character String
13	Sebastian	Sebastian	No Stemming, Character String
14	Sierra Tel	"Sierra Tel"	No Stemming, Character String
15	Stageline	Stageline	No Stemming, Character String
16	Surewest	Surewest, "Surewest Fiber"	No Stemming, Character String
17	Varcomm	Varcomm	No Stemming, Character String
18	Varnet	Varnet	No Stemming, Character String

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STIPULATION AND ORDER RE DISCOVERY DISAGREEMENTS BETWEEN PLAINTIFF MP NEXLEVEL OF CALIFORNIA, INC. AND DEFENDANT CVIN, LLC