1 2 3 4	Michael A. Geibelson, Bar No. 179970 MAGeibelson@rkmc.com Amy M. Churan, Bar No. 216932 AMChuran@rkmc.com ROBINS, KAPLAN, MILLER & CIRESI L.L.I 2049 Century Park East, Suite 3400 Los Angeles, CA 90067-3208	D.	
5 6	Telephone: 310-552-0130 Facsimile: 310-229-5800  Attorneys for Plaintiff		
7	BEST BUY STORES, L.P.		
8	UNITED STATES DISTRICT COURT		
9	EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION		
10			
11	BEST BUY STORES, L.P., a Virginia limited partnership,	Case No. 2:10-CV-00389-WBS-KJN	
12	Plaintiff,	JOINT STIPULATION TO AMEND THE NOVEMBER 12, 2010 PROTECTIVE	
13	V.	ORDER	
14 15	MANTECA LIFESTYLE CENTER, LLC. a Delaware limited liability company,		
16	Defendant.		
17 18	MANTECA LIFESTYLE CENTER, LLC		
19	Counter-Claimant		
20	v.		
21	BEST BUY STORES, L.P., a Virginia limited partnership,		
22 23	Counter-Defendant		
24	Plaintiff BEST BUY STORES. L.F	P., ("Best Buy") and Defendant MANTECA	
25	LIFESTYLE CENTER, LLC ("Manteca), collectively referred to as the "Parties" by and through their respective undersigned counsel, hereby stipulate and agree as follows:		
<ul><li>26</li><li>27</li></ul>			
28			
	60511238 1	JOINT STIPULATION RE MODIFICATION	

## IT IS HEREBY STIPULATED AND AGREED by the stipulating parties that:

- 1. Documents produced by third-party MSTSD, Inc., will be covered under the protections of the "Revised Stipulated Protective Order" dated November 12, 2010, attached hereto as Exhibit "A".
- 2. Further, the following language will be deemed to be part of the Revised Stipulated Protective Order as category "(f)" under Section 1 entitled: <u>PURPOSES AND LIMITATIONS</u> as follows:
  - f). Documents produced by non-parties that include internal design and construction documents related to the planning, design and development of the Manteca Lifestyle Center project. These records are unique and highly proprietary and protection of this information as Highly Confidential is very important to the competitive position of the respective non-party. Protection by way of a court order is appropriate so that there is a prompt mechanism to extract any designated documents from public disclosure, whether inadvertent or otherwise.

18	DATED: September, 2011	ROBINS, KAPLAN, MILLER & CIRESI L.L.P
19		D.
20		By: Michael A. Geibelson
21		Amy M. Churan
22		ATTORNEY FOR PLAINTIFF BEST BUY STORES, L.P.
23	DATED: September, 2011	GREENBERG TRAURIG, LLP
24		To the state of th
25		By: Howard Jeruchimowitz
26		ATTORNEY FOR DEFENDANT
27		MANTECA LIFESTYLE CENTER, LLC

## PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 29, 2011

KENDALL J. NEWMAN

UNITED STATES MAGISTRATE JUDGE