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23 and Counter-Defendant

24 UNITED STATES DISTRICT COURT
25 EASTERN DISTRICT OF CALIFORNIA

26 GUTTERGLOVE, INC. a California
27 Corporation,
28 Plaintiff,
29 v.
30 AMERICAN DIE and
31 ROLLFORMING, INC., a California
32 corporation; and ARTESIAN HOME
33 PRODUCTS, dba VALOR
34 GUTTER GUARD,
35 Defendants.

36 Case No. 2:16-CV-02408-WHO
37 Judge: Hon. William H. Orrick
38 **STIPULATED ORDER PURSUANT
39 TO F.R.E. 502(d)**
40 **JURY TRIAL DEMAND**

1 The production of privileged or work-product protected documents,
2 electronically stored information (“ESI”) or information, whether inadvertently or
3 otherwise, is not a waiver of the privilege or protection from discovery in this case
4 or in any other federal or state proceeding. This Stipulated Order shall be
5 interpreted to provide the maximum protection allowed by Federal Rule of
6 Evidence 502(d).

7 Nothing contained herein is intended to or shall serve to limit a party’s right
8 to conduct a review of documents, ESI or information (including metadata) for
9 relevance, responsiveness and/or segregation of privileged and/or protected
10 information before production.

11
12 **IT IS SO STIPULATED**, through Counsel of Record.

13 Dated: October 13, 2017 /s/ Jacob Song
14 Counsel for Plaintiff

15 Dated: October 13, 2017 /s/ John P. Costello
16 Counsel for Defendant

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18 **IT IS ORDERED** that the forgoing Agreement is approved.

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20 Dated: October 16, 2017 
21 HON. WILLIAM H. ORRICK
22 UNITED STATES DISTRICT JUDGE
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