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22 Attorneys for Plaintiff, GUTTERGLOVE, INC.

23 UNITED STATES DISTRICT COURT
24 EASTERN DISTRICT OF CALIFORNIA

25 GUTTERGLOVE, INC. a California
26 Corporation,

27 Plaintiff,

28 v.

29 WILLIAM LASELL, an individual,
30 AMERICAN DIE and
31 ROLLFORMING, INC., a California
32 corporation; and ARTESIAN HOME
33 PRODUCTS, dba VALOR GUTTER
34 GUARD,

35 Defendants.

Case No. 2:17-CV-01372-WBS-CKD

**STIPULATED ORDER PURSUANT
TO F.R.E. 502(d)**

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

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9 Nothing contained herein is intended to or shall serve to limit a party’s right
10 to conduct a review of documents, ESI or information (including metadata) for
11 relevance, responsiveness and/or segregation of privileged and/or protected
12 information before production.
13


14 **IT IS SO STIPULATED**, through Counsel of Record.

15
16 Dated: October 13, 2017 /s/ Jacob Song
Counsel for Plaintiff

17
18 Dated: October 13, 2017 /s/ John P. Costello
Counsel for Defendant

19
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21 **IT IS ORDERED** that the forgoing Agreement is approved.

22 Dated: October 13, 2017



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE