

1 ALAN B. EXELROD (SBN: 50467)
2 PATRICE L. GOLDMAN (SBN: 142855)
3 RUDY EXELROD & ZIEFF, L.L.P.
351 California Street, Suite 700
4 San Francisco, CA 94104
Telephone: (415) 434-9800
5 Facsimile: (415) 434-0513
E-mail: plg@reztlaw.com

6 Attorneys for Plaintiff,
JENNIFER JORDAN

7 BRIAN LEE JOHNSRUD, State Bar No. 184474
8 MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square
9 3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2122
10 Tel: (650) 843-4000
Fax: (650) 843-4001
E-mail: bjohnsrud@morganlewis.com

11 M. MICHAEL COLE, State Bar No. 235538
12 MORGAN, LEWIS & BOCKIUS LLP
13 One Market, Spear Street Tower
San Francisco, CA 94105-1126
14 mcole@morganlewis.com
Tel: (415) 442-1000
15 Fax: (415) 442-1001
E-mail: mcole@morganlewis.com

16 Attorneys for Defendant,
17 DOUBLECLICK INC.

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 JENNIFER JORDAN,
22 Plaintiff,
23 vs.
24 DOUBLECLICK, INC.; DOES 1-30,
25 Defendants.

Case No. 06-CV-7965 JSW

**STIPULATION AND [PROPOSED]
ORDER TO STAY DECISION ON
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

1 Plaintiff Jennifer Jordan ("Plaintiff") and Defendant DoubleClick, Inc. ("Defendant")
2 (collectively, the "Parties"), by and through their respective counsel of record, file this Stipulation
3 and Proposed Order to Stay this Court's Pending Decision on Defendant's Motion for Summary
4 Judgment, Or In the Alternative, Partial Summary Judgment ("Summary Judgment Motion"):

5 WHEREAS, on February 1, 2008, the Court heard argument on Defendant's Summary
6 Judgment Motion and at the conclusion of the hearing, took the matter under submission;

7 WHEREAS, following argument on Defendant's Summary Judgment Motion, the parties
8 engaged in further settlement discussions and negotiations and believe they have resolved the
9 matter;

10 WHEREAS, the parties stipulate to stay any ruling on Defendant's Summary Judgment
11 Motion for at least one week from the date of this Stipulation and Proposed Order so that
12 discussions and negotiations over all the terms of a settlement can be completed and
13 memorialized:

14 GOOD CAUSE EXISTS to stay a ruling on Defendant's Summary Judgment Motion as
15 set forth herein, and to avoid the potential unnecessary use of judicial resources.

16 IT IS SO STIPULATED


17
18 Dated: February 5, 2008

RUDY EXELROD & ZIEFF, L.L.P.

19 By: 
20 Patrice L. Goldman
21 Attorney for Plaintiff JENNIFER JORDAN

22 Dated: February 5, 2008

MORGAN LEWIS & BOCKIUS LLP

23 By: 
24 Brian L. Johnsrud
25 Attorney for Defendant DOUBLECLICK, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

The Court, having considered the Stipulation and Plaintiff and Defendant, approves said Stipulation per the terms contained therein.

IT IS SO ORDERED

DATED: February
~~January~~ 6, 2008


HONORABLE JEFFREY S. WHITE