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11 *Interim Co-Lead Counsel for Plaintiffs*

12
 13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

16 **IN RE TRANSPACIFIC PASSENGER**
 17 **AIR TRANSPORTATION ANTITRUST**
 18 **LITIGATION**

Civil Case No. **3:07-cv-05634-CRB-DMR**
 MDL No. **1913**

19 **This Document Relates to:**
 20 **All Actions**

STIPULATION AND [PROPOSED] ORDER
RE DEPOSITION LIMITS

Judge: Hon. Donna M. Ryu
Date: February 14, 2013
Time: 11:00 a.m.

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WHEREAS, the parties have met and conferred concerning limits on the number of depositions to be taken in this case and have agreed as follows:

1. Plaintiffs and Defendants may take a total of 90 depositions per side.

2. No more than 10 (including 30(b)(6)) depositions may be conducted by one side of deponents related to a single party on the opposing side, except that this limitation shall not apply to any party which has pled guilty to violating the Sherman Act in relation to the provision of Transpacific passenger air transportation or to former employees of a single party who are not represented by counsel for the party. The limit on depositions related to a single party which has pled guilty to violating the Sherman Act in relation to the provision of Transpacific passenger air transportation shall be 15.

3. Rule 30(a)(2)(A)(ii) and the seven hour presumptive limit of Rule 30(d)(1) shall apply to all depositions, except that depositions for which interpreters are used shall have a nine hour presumptive limit.

4. The foregoing limitation of 90 depositions per side shall not include any depositions of expert witnesses.

5. Any limitations set forth above may be modified by agreement of the parties or upon a showing of good cause to the Court after appropriate efforts to resolve disputes between the parties have been made.

Dated: February 13, 2013

Respectfully submitted,

By: /s/ Steven N. Williams
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Interim Co-Lead Counsel for Plaintiffs

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By: /s/ Robert B. Hawk

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Counsel for Defendant Vietnam Air Lines

ATTESTATION OF FILING

I, Steven N. Williams, hereby attest, pursuant to Northern District of California, Local Rule 5-1(i)(3), that concurrence to the filing of this document has been obtained from each signatory hereto.

/s/ Steven N. Williams

Steven N. Williams

SO ORDERED.

Dated: February 14, 2013

