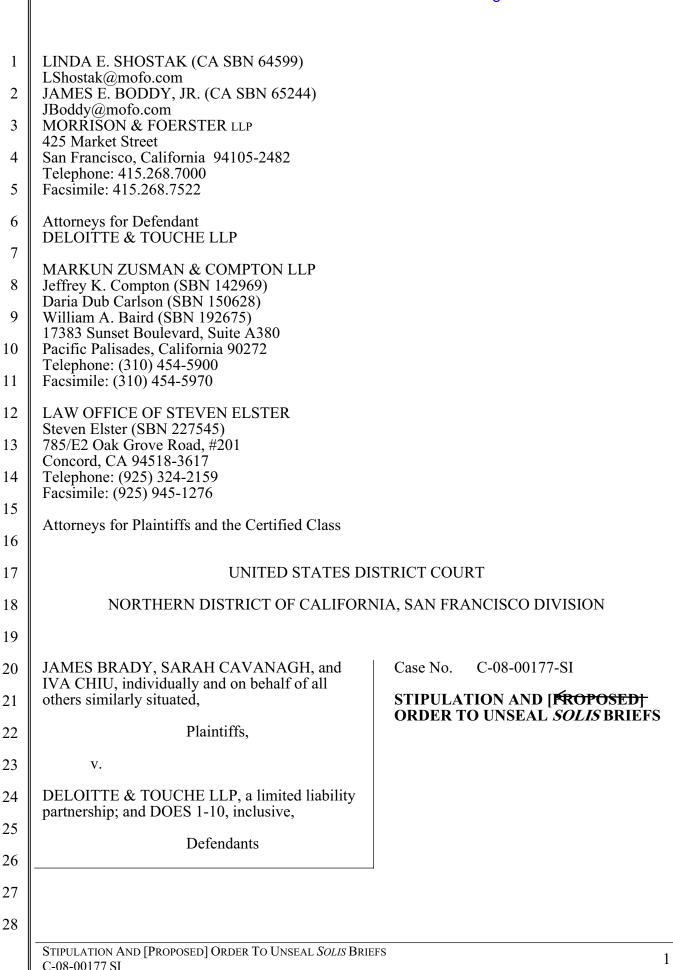
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Pursuant to Local Rule 7-12, Plaintiffs and Defendant Deloitte & Touche LLP ("Defendant"), through their respective counsel, submit the following stipulation and [proposed] order that certain pleadings, as described below, conditionally filed with the Court under seal be unsealed.

WHEREAS, in the course of the discovery Defendant has produced and disclosed confidential, proprietary, and other private information related to the parties, as well as Defendant's clients, designated "Confidential" or "Highly Confidential - Attorneys' Eyes Only" pursuant to the parties' Stipulated Protective Order signed by the Court on March 10, 2009, and filed in the above captioned action on March 11, 2009 ("Designated Produced Materials"), for which Defendant believes special protection from public disclosure and from use for any purpose other than prosecuting this litigation would be warranted;

WHEREAS, the parties have agreed that material designated as confidential, proprietary, and other private information related to the parties, as well as Defendant's clients, may be included in or discussed in the parties' filings with respect to Defendant's Motion for Class Decertification ("Designated Motion Materials");

WHEREAS, the parties agreed and the Court ordered pursuant to the parties' stipulations and proposed orders that Plaintiffs' Briefing re <u>Solis v. Washington</u> and Plaintiffs' Reply to Deloitte's Briefing re <u>Solis v. Washington</u> (collectively, "*Solis* Briefs") be conditionally filed under seal;

WHEREAS, the parties agreed that they would meet and confer regarding whether the documents filed under seal pursuant to said stipulations and orders should remain under seal; and

WHEREAS, the parties, having met and conferred, have agreed that the Court may order the *Solis* Briefs filed under seal to be unsealed, without prejudice to either parties' rights to maintain or not maintain under seal any other briefs or documents filed with the Court under seal and that said order shall not affect the under-seal status of any other briefs or documents filed with the Court under seal, including without limitation any exhibits referred to in the *Solis* Briefs.

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1	NOW THEREFORE, the parties hereby stipulate, subject to Court approval, that the		
2	following briefs conditionally filed under seal herein be unsealed:		
3	1. Plaintiffs' Briefing re Solis v. Washington; and		
4	2. Plaintiffs' Reply to Deloitte's Briefing re Solis v. Washington.		
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6	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.		
7			
8	COUNSEL FOR DEFENDANT DELOITTE & TOUCHE LLP		
9			
10	DATE: October 26, 2011 By:/S/ James E. Boddy		
11	Linda E. Shostak		
12	James E. Boddy, Jr. MORRISON & FOERSTER LLP		
13	COUNSEL FOR PLAINTIFFS		
14	COUNDELTOKTEMINTHIS		
15	DATE: October 26, 2011 By: _/s/ William A. Baird_		
16	William A. Baird		
17	Daria Dub Carlson Jeffrey K. Compton		
18	MARKUN ZUSMAN & COMPTON, LLP		
19	Steven Elster LAW OFFICE OF STEVEN ELSTER		
20	ENW OTTICE OF STEVEN EESTER		
21	ECF CERTIFICATION		
22	I hereby attest that I have obtained concurrence regarding the filing of this document from		
23	each of the signatories within the e-filed document.		
24			
25			
26	DATE: October 26, 2011 By:/s/ James E. Boddy James E. Boddy		
27	valled E. Doddy		
28			

STIPULATION AND [PROPOSED] ORDER TO UNSEAL SOLIS BRIEFS C-08-00177 SI sf-3049065

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1	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
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4	Honorab United S	e Susan Illston ates District Court Judge	
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STIPULATION AND [PROPOSED] ORDER TO UNSEAL SOLIS BRIEFS C-08-00177 SI sf-3049065