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6 Attorneys for Defendant  
 7 ELECTRONIC ARTS, INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

12 GEOFFREY PECOVER and JEFFREY  
 LAWRENCE, on Behalf of Themselves and  
 13 All Others Similarly Situated,

14 Plaintiffs,

15 v.

17 ELECTRONIC ARTS, INC., a Delaware  
 Corporation

18 Defendant.  
 19  
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CASE NO. C 08-02820 VRW

**STIPULATION AND ~~PROPOSED~~ ORDER  
 ENLARGING TIME TO FILE  
 DECLARATIONS IDENTIFIED IN THE  
 COURT'S JUNE 25, 2009 ORDER**

1 WHEREAS, the Court heard argument on plaintiffs’ motion to compel on June  
2 24, 2009;

3 WHEREAS, the Court issued an Order on June 25, 2009 denying the motion to  
4 compel without prejudice;

5 WHEREAS, the Court’s June 25, 2009 Order states: “If plaintiffs believe they  
6 are entitled to additional documents, having in mind the views of the Court, they should file by  
7 June 29, 2009 a declaration of an expert explaining with some particularity why further  
8 documents are needed. In that event, defendant should file by July 6, 2009 one or more  
9 declarations explaining with some particularity the burden it would bear in producing the  
10 additional requested documents.”;

11 WHEREAS, as the Court suggested, the parties have been meeting and conferring  
12 in an effort to reach a compromise on this issue;

13 WHEREAS, the parties believe a one week extension on the deadlines to file the  
14 declarations identified in the Court’s June 25 Order will allow the parties sufficient time to  
15 complete the meet and confer on this issue, and hopefully resolve or narrow the issue without  
16 further burden on the Court;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the  
18 undersigned counsel for the parties as follows:

19 1. In accord with the Court’s June 25, 2009 Order, if plaintiffs believe they  
20 are entitled to additional documents, having in mind the views of the Court, they will file by July  
21 6, 2009 a declaration of an expert explaining with some particularity why further documents are  
22 needed.

23 2. In that event, defendant will file by July 13, 2009 one or more declarations

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1 explaining with some particularity the burden it would bear in producing the additional requested  
2 documents.

3 **IT IS SO STIPULATED.**

4 Dated: June 29, 2009

Respectfully Submitted,

LATHAM & WATKINS LLP  
Daniel M. Wall  
Timothy L. O'Mara

By \_\_\_\_\_ /s/ Timothy L. O'Mara  
Timothy L. O'Mara  
Attorneys for Defendant  
ELECTRONIC ARTS, INC.

10 Dated: June 29, 2009

Respectfully Submitted,


HAGENS BERMAN SOBOL SHAPIRO LLP  
Shana Scarlett

THE PAYNTER LAW FIRM PLLC  
Stuart M. Paynter

By \_\_\_\_\_ /s/ Shana Scarlett  
Shana Scarlett  
Attorneys for Plaintiffs  
G. PECOVER and J. LAWRENCE

18  
19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: June 30, 2009

  
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THE HONORABLE BERNARD ZIMMERMAN  
United States Magistrate Judge

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**ELECTRONIC CASE FILING ATTESTATION**  
**(General Order No. 45(X)(B))**

I, Timothy L. O'Mara, am the ECF User whose identification and password are being used to file this STIPULATION ENLARGING TIME TO FILE DECLARATIONS IDENTIFIED IN THE COURT'S JUNE 25, 2009 ORDER. In compliance with General Order No. 45 (X)(B), I hereby attest that the concurrence in the filing of this document has been obtained from Shana Scarlett.

Dated: June 29, 2009

Respectfully submitted,

LATHAM & WATKINS LLP  
Daniel M. Wall  
Timothy L. O'Mara

By                   /s/ Timothy L. O'Mara                    
Timothy L. O'Mara  
Attorneys for Defendant  
ELECTRONIC ARTS, INC.

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