



1 Pursuant to this Court’s Standing Order and Civil Local Rule 7-12, Plaintiff Northstar  
2 Financial Advisors, Inc. (“Northstar”) and defendants Schwab Investments, Charles Schwab & Co.,  
3 Inc., Charles Schwab Investment Management, Inc., and Schwab Total Bond Market Fund  
4 (“Defendants”), by and through their counsel, hereby jointly submit a stipulated request for an order  
5 sealing Plaintiff’s Disclosure of Non-Party Interested Entities or Persons (“Plaintiff’s Disclosure”).

6 **RECITALS**

7 **WHEREAS**, the above-captioned action *Northstar Financial Advisors v. Schwab*  
8 *Investments*, et al., No. C-08-4119 SI was filed on August 28, 2008;

9 **WHEREAS**, pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16-9, the  
10 parties are concurrently filing their joint case management conference statement;

11 **WHEREAS**, the Standing Order for All Judges of the Northern District of California  
12 regarding the Contents of Joint Case Management Statement (Item No. 19) orders the parties to  
13 disclose any Non-party Interested Entities or Persons;

14 **WHEREAS**, Northstar intends to disclose to defendants and the Court the identities of those  
15 investors who are clients of Northstar and who invested in the Schwab Total Bond Market Fund (the  
16 “Fund”);

17 **WHEREAS**, Northstar contends that the identities of its clients who are investors of the  
18 Fund is not publicly available and should not be put into the public record because these clients are  
19 not parties to the instant action;

20 **WHEREAS**, Northstar maintains that the disclosure of such information would reveal  
21 potentially sensitive financial information and investment decisions of its clients and should be kept  
22 confidential;

23 **WHEREAS**, Northstar’s Disclosure of Non-Party Interested Entities or Persons consists of a  
24 list of its clients who invested in the Fund and is attached to this Stipulation as Exhibit A;

25 **STIPULATION**

26 **IT IS HEREBY STIPULATED**, subject to the Court’s approval, by and between counsel  
27 for Northstar and Defendants:

28 [C-08-4119 SI] STIPULATION AND [PROPOSED] ORDER FOR LEAVE TO FILE UNDER  
SEAL PLAINTIFF’S DISCLOSURE OF NON-PARTY INTERESTED ENTITIES OR PERSONS

- 1           1.       The names and identities of Northstar’s clients who invested in the Fund should not  
2                    be made part of the public record.  
3           2.       Northstar’s Disclosure of Non-Party Interested Entities or Persons, attached as  
4                    Exhibit A to this Stipulation, should be filed under seal.

5  
6 Dated: January 30, 2009

**WOLF POPPER LLP**

7 By: /s Robert C. Finkel  
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**Attorneys for Defendants Schwab  
Investments, Charles Schwab & Co., Inc.,  
Charles Schwab Investment Management,  
Inc., and Schwab Total Bond Market Fund**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_



\_\_\_\_\_  
HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE

1 I, Christopher T. Heffelfinger, am the ECF user whose ID and password are being used to  
2 file this Stipulation and [Proposed] Order for Leave To File Under Seal Plaintiff's Disclosure of  
3 Non-Party Interested Entities or Persons. In compliance with General Order 45, X.B., I hereby attest  
4 that Robert C. Finkel, co-counsel for Plaintiff Northstar, and Dorothy L Fernandez, counsel for  
5 defendants, have concurred in this filing.

6  
7 s/ Christopher T. Heffelfinger  
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