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 MICHAEL C. PATTISON

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 11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 SECURITIES AND EXCHANGE
 14 COMMISSION,

15 Plaintiff,

16 vs.

17 RAJ P. SABHLOK AND MICHAEL C.
 18 PATTISON,

19 Defendants.

Case No: CV 08-04238-CRB (JL)

ASSIGNED TO:
 THE HONORABLE CHARLES R. BREYER

**STIPULATION AND [PROPOSED] ORDER
 RE DEFENDANT'S MOTION TO COMPEL
 THE DEPOSITION OF WILLIAM T.
 SALZMANN**

Date: November 13, 2009
 Time: 10:00 a.m.
 Judge: U.S. Magistrate Judge James Larson

Date Action Filed: 9/9/08

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 24 **STIPULATION**

25 This Stipulation Re Defendant Michael C. Pattison's Motion to Compel Deposition of
 26 William T. Salzman is entered into between Plaintiff Securities and Exchange Commission
 27 ("Plaintiff"), Defendant Michael C. Pattison ("Pattison"), and Defendant Raj P. Sabhlok
 28 ("Sabhlok") with reference to the following facts:

1 A. A discovery dispute arose between Plaintiff and Defendant Pattison regarding
2 whether Plaintiff must make William Salzman, one of Plaintiff's attorneys, available for
3 deposition.

4 B. On October 9, 2009, Defendant Pattison filed a Motion seeking an Order:
5 (1) requiring Plaintiff Securities and Exchange Commission ("SEC") to produce
6 William T. Salzman, Esq., counsel for the SEC, for a deposition by no later
7 than November 24, 2009 on any topic that he may testify on at trial (and
8 accept a deposition notice mail-served on the SEC's counsel);
9 or, in the alternative,
10 (2) prohibiting Mr. Salzman from testifying at trial for any purpose.

11 C. By this Stipulation, the parties wish to resolve this discovery dispute and the
12 Motion.

13 IT IS HEREBY STIPULATED that:

14 1. No party will call Mr. Salzman as a witness to testify in this action for any
15 purpose, nor will any party encourage or advocate that Mr. Salzman testify for any purpose at
16 trial or otherwise, including in any party's case-in-chief, defense or rebuttal.

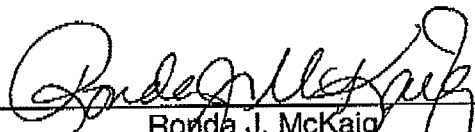
17 2. The Court's entry of an order on this Stipulation shall constitute an Order that Mr.
18 Salzman shall not testify in this action for any purpose.

19 3. Upon the Court's entry of an order on this Stipulation, the Motion will be
20 withdrawn.

21 IT IS SO STIPULATED.

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23 Dated: October 16, 2009

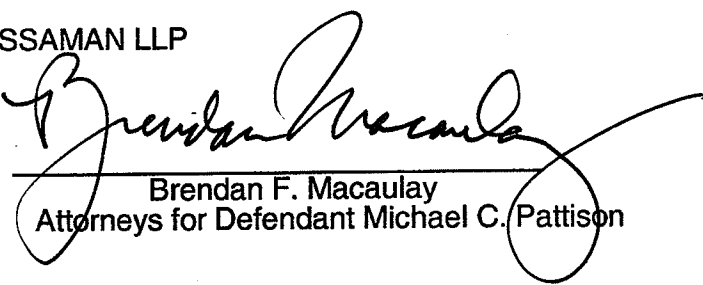
SKADDEN ARPS SLATE MEAGHER & FLOM LLP

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26 By: 
27 Ronda J. Mckaig
28 Attorneys for Defendant Raj P. Sabhlok

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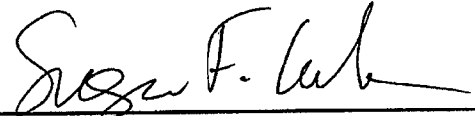
Dated: October 16, 2009

NOSSAMAN LLP

By: 
Brendan F. Macaulay
Attorneys for Defendant Michael C. Pattison

Dated: October 16, 2009

SECURITIES AND EXCHANGE COMMISSION

By: 
Susan F. LaMarca
Securities And Exchange Commission

IT IS SO ORDERED.

DATED: 10-20-09


United States Magistrate Judge James Larson