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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KATHERINE DOYLE,

Plaintiff,

v.

CT CORPORATION SYSTEM, WOLTERS
KLUWER, ACCESSDATA GROUP, and DOES
1-20,

Defendants.

Case No. CV 10-5147 CRB

**STIPULATION AND
[PROPOSED] ORDER
REGARDING FED. R. CIV. P.
26(A)(3) PRETRIAL
DISCLOSURES**

1 Whereas, Federal Rule of Civil Procedure 26(a)(3) provides that, unless otherwise
2 directed by the Court, Pretrial Disclosures must be exchanged at least 30 days before trial; and

3 Whereas, the Court's Guidelines for Trial and Pretrial Conference in Civil Jury Cases set
4 forth a different procedure for deposition designation than that in Fed. R. Civ. P. 26(a)(3)(A)(ii);
5 and

6 Whereas, the hearing on Defendant AccessData Group, LLC's Motion for Summary
7 Judgment was postponed by this Court's order; and

8 Whereas, the hearing on Defendant AccessData Group, LLC's Motion for Summary
9 Judgment will be held on Friday, January 13, 2012; and

10 Whereas, in the interest of conservation of time and resources, the parties have conferred
11 and agreed that Pretrial Disclosures should not be exchanged until after the Court rules on
12 Defendant AccessData Group, LLC's Motion for Summary Judgment; and

13 Whereas, this case is set for final pretrial conference on February 2, 2012 and trial on
14 February 6, 2012;

15 The parties hereby stipulate that the following schedule shall govern the exchange of the
16 required Rule 26(a)(3) Pretrial Disclosures and Objections thereto:

17 1. The parties shall exchange, and file with the Court, the Pretrial Disclosures set
18 forth in Fed. R. Civ. P. 26(a)(3)(A)(i) and (iii) on or before January 25, 2012; and

19 2. Each party may serve and file objections to the opposing party's disclosures
20 according to Fed. R. Civ. P. 26(a)(3)(B) on or before January 31, 2012.

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2 Dated: January 11, 2012

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5 ALAN EXELROD
6 JOHN T. MULLAN
7 RUDY, EXELROD, ZIEFF & LOWE, LLP

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9
10 By: /s/ Alan Exelrod
11 ALAN EXELROD

12 Attorneys for Plaintiff
13 KATHERINE DOYLE

14
15 Dated: January 11, 2012

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17 LINDA E. SHOSTAK
18 COLETTE M. LEBON
19 MORRISON & FOERSTER LLP

20
21 By: /s/ Linda E. Shostak
22 LINDA E. SHOSTAK

23 Attorneys for Defendant
24 ACCESSDATA GROUP, LLC

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26
27 Dated: January 13, 2012

28 Honorable CHARLES R. BREYER
United States District Judge

