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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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12 KATHERINE DOYLE,

13 Plaintiff,

14 v.

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

17 Defendants.
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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.

1 Dated: January 11, 2012

2 ALAN EXELROD
3 JOHN T. MULLAN
4 RUDY, EXELROD, ZIEFF & LOWE, LLP

5 By: /s/ Alan Exelrod
6 ALAN EXELROD

7 Attorneys for Plaintiff
8 KATHERINE DOYLE

9 Dated: January 11, 2012

10 LINDA E. SHOSTAK
11 COLETTE M. LEBON
12 MORRISON & FOERSTER LLP

13 By: /s/ Linda E. Shostak
14 LINDA E. SHOSTAK

15 Attorneys for Defendant
16 ACCESSDATA GROUP, LLC

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: January 13, 2012

19 Honorable CHARLES R. BREYER
20 United States District Judge

