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March 5, 2014

VIA ECF FILING

The Honorable Nathaniel Cousins
 Magistrate Judge of the United States
 District Court, Northern District of California
 Courtroom A, 15th Floor
 450 Golden Gate Avenue
 San Francisco, CA 94103

Re: ***Barnes, et al. v. The Hershey Company***
Case No.: 3:12-cv-01334-CRB

Dear Judge Cousins:

The parties submit this joint status report as required by Your Honor's February 7, 2014 Opinion and Order (ECF 118). On February 7, 2014, the parties agreed to a Stipulation Regarding Protocol for Document Production Including Electronically Stored Information and Data, the Obligation for Document Preservation, and the Procedure for the Protection and Assertion of Privilege. Since that time the parties have been negotiating search terms and the protocol for reviewing and producing documents returned by those search terms. During those negotiations, disputes have arisen. The parties have been unable to resolve these disputes and anticipate seeking the Court's intervention. To that end, the parties anticipate filing a joint discovery dispute letter by March 14, 2014.

Very truly yours,
/s/ Michael J. Puma
 Michael J. Puma
Attorney for Defendant
/s/ Thomas J. Brandi
 THOMAS J. BRANDI
Attorney for Plaintiffs

