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7 Attorneys for Plaintiff
8 SYNOPSIS, INC.

9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 SYNOPSIS, INC., a Delaware corporation,

13 Plaintiff,

14 v.

15 DEEPAK SABHARWAL, an individual,

16 Defendant.

Case No. 3:12-cv-05334-RS

**STIPULATION AND ~~PROPOSED~~
ORDER] FOR ENTRY OF
TEMPORARY RESTRAINING ORDER,
ORDER FOR EXPEDITED
DISCOVERY AND ENTRY OF
PROTECTIVE ORDER**

Date:
Time:
Dept:
Judge:

1 1. Plaintiff Synopsys, Inc. ("Plaintiff") has filed a Complaint against Defendant
2 Deepak Sabharwal. The Complaint alleges copyright infringement, trade secret misappropriation,
3 computer abuse and fraud and unfair business practices against Mr. Sabharwal. Based on its
4 complaint, Plaintiff believes good cause exists which supports entry of a temporary restraining
5 order by the Court and is prepared to file such application and supporting papers.

6 2. In an effort to resolve any issues which might support entry of a Court restraining
7 order, Defendant and Plaintiff agree to immediate entry of the following.

8 **Temporary Restraining Order:**

- 9 1. Defendant Deepak Sabharwal shall not use, disclose, transfer, copy, destroy, license or
10 otherwise encumber any Synopsys confidential or proprietary information, including any
11 document or file from his Synopsys-issued laptop and all Synopsys algorithms, processes,
12 data, know-how, computer software in both source and object form, interfaces, designs,
13 data structures, improvements, inventions, works of authorship, techniques, development
14 roadmaps, resource allocation plans, business or marketing plans, strategies, forecasts and
15 customer or contact lists;
- 16 2. Mr. Sabharwal shall not use, disclose, transfer, copy, destroy, license or otherwise
17 encumber any third party confidential or proprietary information that he received access to
18 during his employment at Synopsys, including all Intel confidential or proprietary
19 information;
- 20 3. Mr. Sabharwal shall immediately return all Synopsys confidential or proprietary
21 information and third party confidential or proprietary information to Synopsys; and
- 22 4. This order shall remain in effect for at least twenty-eight (28) days from entry to allow the
23 parties to complete expedited discovery and attempt to reach final and permanent
24 resolution of this matter.

25 **Expedited Discovery:**

- 26 5. Mr. Sabharwal shall comply with expedited discovery. A Protective Order, attached as
27 Exhibit A is entered by the Court to facilitate expedited discovery.
- 28 6. Mr. Sabharwal shall produce for forensic inspection all electronic storage media,

1 including all external hard drives and flash drives that have ever contained any Synopsys
2 confidential or proprietary or third party confidential or proprietary information that
3 Sabharwal received access to during his employment at Synopsys, including all Intel
4 confidential or proprietary information, by October 26, 2012.

- 5 7. To the extent Mr. Sabharwal used any internet cloud-based storage application, any social
6 networking, any internet based email application, or similar application to store any
7 Synopsys confidential or proprietary information or third party confidential or proprietary
8 information, he shall provide the user access credentials to each such application to
9 Plaintiffs' counsel by October 26, 2012. These credentials will be designated "Highly
10 Confidential – Attorneys' Eyes Only" pursuant to the Protective Order.
- 11 8. Synopsys shall immediately propound to Mr. Sabharwal requests for production,
12 interrogatories and a notice of deposition.
- 13 9. Mr. Sabharwal shall provide substantive responses to each interrogatory and make
14 responsive documents and things available in response to Synopsys' requests for
15 production by October 26, 2012.
- 16 10. Mr. Sabharwal shall appear for his deposition on or about November 1, 2012, as mutually
17 agreed by the parties.

18 Dated: 16 October, 2012

Respectfully submitted

ORRICK, HERRINGTON & SUTCLIFFE LLP


Denise M. Mingrone

Attorneys for Plaintiff SYNOPSYS, INC.

22 Dated: _____ October, 2012

Defendant DEEPAK SABHARWAL

25 Good cause appearing therefor, **IT IS SO ORDERED.**

27 Dated: 10/18 2012


United States District Court Judge

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Respectfully submitted

ORRICK, HERRINGTON & SUTCLIFFE LLP

20 Denise M. Mingrone
21 Attorneys for Plaintiff SYNOPSYS, INC.

22 Dated: 16 October, 2012


23 Defendant DEEPAK SABHARWAL

24
25 Good cause appearing therefor, **IT IS SO ORDERED.**

26
27 Dated: _____ 2012

28 United States District Court Judge