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11 **IN THE UNITED STATES DISTRICT COURT**
 12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

<p>13 IN RE HEWLETT-PACKARD COMPANY SHAREHOLDER 14 DERIVATIVE LITIGATION</p> <p>15 This Document Relates To:</p> <p>16 ALL ACTIONS.</p>	<p>) Master File No. C-12-6003-CRB (EDL))) STIPULATION AND [PROPOSED] ORDER) REGARDING DISCOVERY IN) CONNECTION WITH THE THIRD) AMENDED AND RESTATED) STIPULATION OF SETTLEMENT AS) MODIFIED))))))</p>
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1 **STIPULATION**

2 **WHEREAS**, A.J. Copeland, a shareholder of Hewlett-Packard Company (“HP”
3 or the “Company”), has moved the Court for an order permitting Mr. Copeland to take
4 discovery, including serving the attached document requests and interrogatories, which
5 he asserts is necessary for a meaningful record for the final approval hearing on July 24,
6 2015;

7 **WHEREAS**, on March 25, 2015, the Court denied such motion without
8 prejudice;

9 **WHEREAS**, counsel for the HP and Plaintiff subsequently conferred with
10 counsel for Mr. Copeland; and

11 **WHEREAS**, the participants have agreed to resolve the issue raised by the
12 motion as to whether Mr. Copeland may serve the attached discovery requests upon HP
13 and Plaintiff, subject to Order of the Court, as follows:

- 14 1. The Document Requests attached hereto as Exhibit A and Interrogatories
15 as Exhibit B (collectively “Discovery”) shall be deemed served on HP and
16 Plaintiff.
- 17 2. HP and Plaintiff, through their respective counsel, shall serve their
18 objections, if any, to such Discovery within 14 days following service.
- 19 3. HP and Plaintiff shall otherwise respond to the Discovery within 21 days
20 following service.
- 21 4. Counsel for Mr. Copeland, HP and Plaintiff shall “meet and confer”
22 within 7 days following service of any such objections and additional
23 responses to Discovery to determine whether the objections can be
24 withdrawn or limited and in an attempt to resolve any disputes regarding
25 the responses to the Discovery, generally.

1 5. To the extent there are any remaining disagreements regarding the
2 Discovery and/or the objections thereto, ~~Mr. Copeland shall promptly~~
3 ~~move the Court for relief, such motion to be made returnable 14 Days~~
4 ~~following service thereupon.~~ the parties shall file a joint letter no later than
5 five business days after the meet and confer session, unless otherwise
6 directed by the court. Lead trial counsel for each party must sign the letter,
7 which shall include an attestation that the parties met and conferred in
8 person or by telephone regarding all issues prior to filing the letter. Going
9 issue-by-issue, the joint letter shall describe each unresolved issue,
10 summarize each party's position with appropriate legal authority, and
11 provide each party's final proposed compromise before moving to the next
12 issue. The joint letter shall not exceed eight pages (12-point font or
13 greater; margins no less than one inch) without leave of court. Parties are
14 expected to plan for and cooperate in preparing the joint letter so that each
15 side has adequate time to address the arguments. If a joint letter is not
16 possible, each side may submit a letter not to exceed three pages, which
17 shall include an explanation of why a joint letter was not possible. The
18 parties shall submit one exhibit that sets forth each disputed discovery
19 request in full, followed immediately by the objections and/or responses
20 thereto. No other information shall be included in the exhibit. No other
21 exhibits shall be submitted without prior court approval. The court will
22 review the submission(s) and determine whether formal briefing or
23 proceedings are necessary.

24 **IT IS SO STIPULATED.**

25 Dated: March 27, 2015

Attorneys for Shareholder A.J. Copeland

26 By: /s/ Richard D. Greenfield

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Dated: March 27, 2015

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Dated: March 27, 2015

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Morrical, derivatively on behalf of Hewlett-Packard
Company

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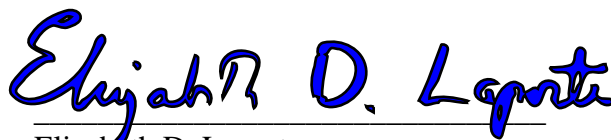
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~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, and good cause appearing,

IT IS SO ORDERED AS MODIFIED.

Date: March 27, 2015



Elizabeth D. Laporte
United States Magistrate Judge