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20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT CALIFORNIA - SAN FRANCISCO DIVISION

23 SYNOPSYS, INC., a Delaware Corporation, )  
24 Plaintiff, )  
25 vs. )  
26 MENTOR GRAPHICS CORPORATION, an )  
Oregon Corporation, )  
27 Defendant. )  
28 )

Case No. 3:12-cv-06467-MMC  
**STIPULATED [~~PROPOSED~~] ORDER  
MODIFYING ORDER FOR DISCOVERY  
OF EMAIL (DKT. NO. 97)**

1 The Court ORDERS as follows:

2 1. This Order modifies the Order for Discovery of Email entered on November 6, 2013  
3 (Dkt. No. 97) to add a third round of email discovery and to enlarge the email production limit.

4 2. Paragraph 12 of the Order for Discovery of Email is modified so that the email  
5 production limit is enlarged from 30,000 to 31,500 emails.

6 3. Paragraph 13 of the Order for Discovery of Email is modified and supplemented as  
7 follows:

8 13. The parties shall request emails in three rounds. The following schedule is  
9 adopted.

10 \* \* \* \*

11  
12 c. Round three: three custodians

13 **Wednesday, January 22, 2014 at 4:00 p.m.:** Parties exchange requests of  
14 three custodians<sup>1</sup> and ten search terms, as well as time frames for the emails to be  
15 searched, if applicable.

16 **Friday, January 24, 2014 at 10:00 a.m.:** Parties meet and confer regarding  
17 search terms, if necessary.

18 **Friday, January 31, 2014:** The producing party shall inform the requesting  
19 party whether the number of documents returned by applying search terms for the  
20 proposed custodians exceeds 1,500 individual emails and provide the results of the  
21 searches. If the results exceed 1,500 individual emails, the requesting party shall,  
22 within two (2) business days, (a) select a subset of search terms for production that  
23 result in fewer than 1,500 individual emails and/or (b) modify the existing search  
24 terms.


25 **February 14, 2014:** Parties complete production of third round of email  
26 discovery.

27 <sup>1</sup> The custodians identified in Round Three must be custodians previously identified by the parties in  
28 Round One and/or Round Two.

1                                **February 19, 2014:** Parties exchange privilege logs for the third round of  
2                                email discovery.

3  
4                                PURSUANT TO STIPULATION, IT IS SO ORDERED.

5  
6                                Dated: January 23, 2014

  
7                                M. XINE M. CHESNEY  
8                                United States District Judge

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