

1 David T. Pritikin (*Pro Hac Vice*)
 2 dpritikin@sidley.com
 3 SIDLEY AUSTIN LLP
 4 1 South Dearborn Street
 5 Chicago, IL 60603
 6 Telephone: (312) 853-7000
 7 Facsimile: (312) 853-7036

8 M. Patricia Thayer (SBN 90818)
 9 pthayer@sidley.com
 10 Philip W. Woo (SBN 196459)
 11 pwoo@sidley.com
 12 SIDLEY AUSTIN LLP
 13 555 California Street, Suite 2000
 14 San Francisco, CA 94104
 15 Telephone: (415) 772-1200
 16 Facsimile: (415) 772-7400

17 I. Neel Chatterjee (SBN 173985)
 18 nchatterjee@orrick.com
 19 ORRICK, HERRINGTON & SUTCLIFFE LLP
 20 1000 Marsh Road
 21 Menlo Park, CA 94025
 22 Telephone: (650) 614-7400
 23 Facsimile: (650) 614-7401

24 Attorneys for Plaintiff
 25 SYNOPSIS, INC., a Delaware Corporation

George A. Riley (SBN 118304)
 griley@omm.com
 Mark E. Miller (SBN 130200)
 markmiller@omm.com
 Luann L. Simmons (SBN 203526)
 lsimmons@omm.com
 Michael Sapoznikow (SBN 242640)
 msapoznikow@omm.com
 O'MELVENY & MYERS LLP
 Two Embarcadero Center, 28th Floor
 San Francisco, CA 94111
 Telephone: (415) 984-8700
 Facsimile: (415) 984-8701

Kristin L. Cleveland (SBN 184639)
 kristin.cleveland@klarquist.com
 Salumeh R. Loesch
 salumeh.loesch@klarquist.com
 Jeffrey S. Love (SBN 195068)
 jeffrey.love@klarquist.com
 Andrew M. Mason (*Pro Hac Vice*)
 andrew.mason@klarquist.com
 John D. Vandenberg (*Pro Hac Vice*)
 john.vandenberg@klarquist.com
 KLARQUIST SPARKMAN, LLP
 121 S.W. Salmon Street, Suite 1600
 Portland, OR 97204
 Telephone: (503) 595-5300
 Facsimile: (503) 595-5301

Attorneys for Defendant
 MENTOR GRAPHICS CORPORATION, an
 Oregon Corporation

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT CALIFORNIA - SAN FRANCISCO DIVISION

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

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 fourth 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 31,500 to 32,850 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 four rounds. The following schedule is
9 adopted.

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12 c. Round four: two custodians

13 **Tuesday, June 3, 2014:** Mentor provides search results for custodian Mark
14 Porter using search terms previously identified during the meet-and-confer process.

15 **Wednesday, June 4, 2014:** Mentor provides requests for two custodians and
16 five search terms per custodian.

17 Synopsys informs Mentor whether Mentor should proceed with the production
18 of Mr. Porter's emails.

19 **Tuesday, June 10, 2014:** Synopsys provides search results for Mentor's
20 requests.

21 Mentor provides search results for custodian Thomas Delaye using search
22 terms previously identified during the meet-and-confer process.

23 Mentor completes production of Mr. Porter's emails if Synopsys has
24 requested such production.

25 **Wednesday, June 11, 2014:** If the search results for Mr. Delaye exceed
26 1,350 emails less the number of emails produced for Mr. Porter, Synopsys either (a)
27 selects a subset of search terms for Mr. Delaye that will result in production of less
28


1 than 1,350 emails total or (b) modifies the existing search terms in accordance with
2 the procedure for modifying search terms contained in the Order for Discovery of
3 Email entered on November 6, 2013 (Dkt. No. 97). If the search results for Mentor's
4 requests exceed 1,350 emails Mentor either (a) selects a subset of search terms will
5 result in production of less than 1,350 emails total or (b) modifies the existing search
6 terms in accordance with the procedure for modifying search terms contained in
7 modifies the Order for Discovery of Email entered on November 6, 2013 (Dkt. No.
8 97).

9 **June 20, 2014:** Parties complete production of fourth round of email
10 discovery.

11 **June 25, 2014:** Parties exchange privilege logs for the fourth round of email
12 discovery.

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14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 Dated: June 23, 2014

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18 MAXINE M. CHESNEY
19 United States District Judge
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