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*Attorneys for Defendant  
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*Additional counsel listed on the next page*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

18 STEVE RABIN and JOHN CHAPMAN,  
 19 on behalf of themselves, and all others  
 20 similarly situated,

Plaintiffs,

v.

22 PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 16-cv-02276-JST

**STIPULATION AND ~~PROPOSED~~ ORDER  
 RE JOINT LETTER BRIEF ON ESI SEARCH  
 PROCESS**

Hon. Judge Jon S. Tigar

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1 Plaintiffs Steve Rabin and John Chapman (“Plaintiffs”) and Defendant  
2 PricewaterhouseCoopers LLP (“PwC”) (collectively, “the Parties”) hereby stipulate and agree as  
3 follows:

4 WHEREAS, on July 13, 2017, Plaintiffs and PwC participated in a telephonic hearing with  
5 the Court regarding ongoing discovery disputes;

6 WHEREAS, the Court’s Minute Order, ECF No. 134, instructed the Parties to submit a joint  
7 letter brief by July 26, 2017, concerning the Parties’ dispute over Plaintiffs’ request for production  
8 of ESI from PwC;

9 WHEREAS, the Parties have engaged in extensive negotiation over the course of  
10 approximately five months to narrow the scope of their remaining ESI dispute;

11 WHEREAS, the Parties’ remaining ESI dispute involves complex issues related to  
12 technology-assisted review (TAR) and ESI best practices;

13 WHEREAS, the Parties have already begun to exchange text;

14 WHEREAS, because of the technical complexity of the ESI issues involved and the  
15 approaches to be proposed, the Parties request that the page limit be extended to a total of eight  
16 pages, with each side allowed at most four pages.

17 THEREFORE, IT IS HEREBY STIPULATED that the page limit is extended to eight  
18 pages, with at most four pages allocated per Party.

19 Dated: July 24, 2017

20 Respectfully submitted,

21 By: /s/ Jahan C. Sagafi  
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1 Dated: July 24, 2017

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23 *PricewaterhouseCoopers LLP*

1 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

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4 Date: July 24, 2017



5 Honorable Jon C. Tigar  
6 United States District Judge  
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