

1 Daniel Velton (SBN 267890)
 2 VJ Chetty (SBN 271778)
 3 VELTON ZEGELMAN P.C.
 4 525 W. Remington Drive, Suite 106
 5 Sunnyvale, CA 94087
 Telephone: (408) 505-7892
 Fax: (408) 228-1930
 dvelton@vzfirm.com
 vchetty@vzfirm.com

6 Attorneys for Plaintiff

Michael Delikat (NY State Bar No. MD1165)
 Appearing pro hac vice
 mdelikat@orrick.com
 Renee B. Phillips (NY State Bar No. RP4456)
 Appearing pro hac vice
 rphillips@orrick.com
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 51 West 52nd Street
 New York, New York 10019-6142
 Telephone: (212) 506-5000
 Fax: (212) 506-5151

Kenneth Herzinger (SBN 209688)
 kherzinger@orrick.com
 Erin M. Connell (SBN 223355)
 econnell@orrick.com
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 405 Howard Street
 San Francisco, CA 94105
 Telephone: (415) 773-5700
 Fax: (415) 773-5759

Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**

17 SVETLANA BLACKBURN,

18 Plaintiff,

19 vs.

20 ORACLE AMERICA, INC.,

21 Defendant.

Case No. 3:16-cv-02925-EMC

**[PROPOSED] STIPULATED RULE
502(d) ORDER**

**Hon. Edward M. Chen
Action Filed: June 1, 2016**

1 **I. PURPOSE**

2 This Stipulated Order will govern discovery of electronically stored information (“ESI”)
3 in this case as a supplement to the Federal Rules of Civil Procedure, this Court’s Guidelines for
4 the Discovery of Electronically Stored Information, and any other applicable orders and rules.

5 **II. DOCUMENTS PROTECTED FROM DISCOVERY**

6 (1) The production of privileged or work-product protected documents,
7 electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is
8 not a waiver of the privilege or protection from discovery in this case or in any other federal or
9 state proceeding. This Order shall be interpreted to provide the maximum protection allowed
10 by Federal Rule of Evidence 502(d).

11 (2) Nothing contained herein is intended to or shall serve to limit a party’s right to
12 conduct a review of documents, ESI or information (including metadata) for relevance,
13 responsiveness and/or segregation of privilege and/or protected information before productions.

14 **IT IS SO STIPULATED.**

15
16 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

17 Dated: November 28, 2016

VELTON ZEGELMAN P.C.

18
19 By: /s/ Daniel Velton

DANIEL VELTON

Attorneys for Plaintiff

20
21
22 Dated: November 28, 2016

ORRICK HERRINGTON & SUTCLIFFE, LLP

23 By: /s/ Michael Delikat

MICHAEL DELIKAT

Attorneys for Defendant

24
25
26 **Filer’s Attestation:** Pursuant to Civil Local Rule 5-1(i)(3), I attest under penalty of
27 perjury that concurrence in the filing of the document has been obtained from its signatory.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: November 28, 2016

Respectfully submitted,

/s/ Michael Delikat
MICHAEL DELIKAT

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/29/2016

Hon. Edward M. Chen
United States District Judge

