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 15 Plaintiff and the Putative Class

16
 17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

19 IRAM BAKHTIAR, individually
 and on behalf of all others
 20 similarly situated,

21 Plaintiff,

22 v.

23 INFORMATION
 RESOURCES, INC, and DOES
 24 1 through 50, inclusive,

25 Defendants.

Case No. 3:17-cv-04559-JST

CLASS ACTION & COLLECTIVE ACTION

~~PROPOSED~~ STIPULATED RULE
 502(d) ORDER

Complaint Filed: August 9, 2017
 Trial Date: None Set

26
 27 Based upon the entire record of proceedings herein and in particular on the stipulation of
 28 the parties, IT IS HEREBY ORDERED THAT:

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

5
6 Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a
7 review of documents, ESI, or information (including metadata) for relevance, responsiveness, and/or
8 segregation of privileged and/or protected information before production.

9 **IT IS SO STIPULATED.**

10 Dated: March 8, 2018

BRYAN SCHWARTZ LAW

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12 By: /s/ Logan Starr
13 Bryan Schwartz
14 Logan Starr
15 Attorneys for Individual and Representative
16 Plaintiff IRAM BAKHTIAR and the Putative
17 Class

18 Dated: March 8, 2018

JACKSON LEWIS P.C.

19 By: /s/ Mitchell F. Boomer
20 Mitchell F. Boomer
21 Robert I. Lockwood
22 Janelle J. Sahouria
23 Attorneys for Defendant
24 INFORMATION SERVICES, INC.

25 **IT IS SO ORDERED.**

26 Dated: March 12, 2018

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HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE