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 8 SEAGATE TECHNOLOGY
 INTERNATIONAL, SEAGATE
 9 SINGAPORE INTERNATIONAL
 HEADQUARTERS PTE LTD

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 OAKLAND DIVISION

15 SEAGATE TECHNOLOGY LLC, a
 Delaware corporation,
 16 SEAGATE TECHNOLOGY
 INTERNATIONAL, a Cayman Islands
 17 Company; SEAGATE SINGAPORE
 INTERNATIONAL HEADQUARTERS
 18 PTE LTD, a Singapore corporation,

19 Plaintiffs,

20 vs.

21 NATIONAL UNION FIRE INSURANCE
 COMPANY OF PITTSBURGH, PA, a
 22 Pennsylvania corporation; INSURANCE
 COMPANY OF THE STATE OF
 23 PENNSYLVANIA, a Pennsylvania
 corporation,

24 Defendants.
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Case No. 4:09-cv-04120-CW

**STIPULATION AND ORDER TO PERMIT
 DEPOSITION OF ALIJAH RABELLDE
 AFTER FACT DISCOVERY CUT-OFF**

Judge: Hon. Claudia Wilken
 Courtroom: 2

Complaint Filed: September 4, 2009

26 Pursuant to Civil Local Rules 6-2 and 26-2, the parties, through their undersigned counsel,
 27 submit the following stipulation and request an order changing time:

28 WHEREAS, the current fact discovery cut-off is August 27, 2010;

1 WHEREAS, Plaintiffs have diligently sought to secure the deposition of Alijah Rabelde,
2 a former employee of AIG WorldSource with knowledge relevant to the above-captioned lawsuit,
3 by serving him with a deposition subpoena pursuant to Federal Rule of Civil Procedure 45;

4 WHEREAS, Plaintiffs have been unable to serve Mr. Rabelde with a deposition subpoena
5 to date and, as a result, it is unlikely Plaintiffs will be able to depose Mr. Rabelde before the
6 current fact discovery cut-off of August 27, 2010;

7 WHEREAS, the parties wish to allow Plaintiffs to depose Mr. Rabelde, even if the
8 deposition must occur after the current fact discovery cut-off;

9 THEREFORE, IT IS HEREBY STIPULATED THAT:

10 1. Plaintiffs may serve Mr. Rabelde with a deposition subpoena and/or take Mr.
11 Rabelde's deposition after the current fact discovery cut-off of August 27, 2010, so long as the
12 deposition occurs on or before September 17, 2010;

13 2. Plaintiffs shall continue to use reasonable efforts to serve a deposition subpoena on
14 Mr. Rabelde and take his deposition as soon as possible;

15 3. After Plaintiffs serve Mr. Rabelde with a deposition subpoena, the parties agree to
16 make themselves reasonably available for the deposition of Mr. Rabelde to take place as soon as
17 possible;

18 4. No other deadlines currently set in this case shall be affected by this Stipulation
19 and [Proposed] Order absent further agreement and application to the Court;

20 5. The parties may seek further relief from the Court regarding Mr. Rabelde's
21 deposition by stipulation or, absent a stipulation, by motion.

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Dated: August 23, 2010

FARELLA BRAUN + MARTEL LLP

I represent that concurrence in the filing of this document has been obtained from the other signatory, which shall serve in lieu of his signature on this document.

By: /s/ Tyler C. Gerking
Tyler C. Gerking

Attorneys for Plaintiffs
SEAGATE TECHNOLOGY LLC, SEAGATE TECHNOLOGY INTERNATIONAL, SEAGATE SINGAPORE INTERNATIONAL HEADQUARTERS PTE LTD

Dated: August 23, 2010

LEWIS BRISBOIS BISGAARD & SMITH, LLP

By: /s/ Stephen Kovarik
Stephen Kovarik

Attorneys for Defendants
NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA and INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/24/2010



JUDGE CLAUDIA WILKEN
United States District Judge