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16 Attorneys for Defendant
DAVID EDLIN

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UNITED STATES DISTRICT COURT

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IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND

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JANET HALEY,

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Plaintiff,

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v.

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COHEN & STEERS CAPITAL
MANAGEMENT, INC., A New York
25 Corporation Doing Business in California; and
DAVID EDLIN, an individual,

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Defendants.

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VAN DE POEL, LEVY & ALLEN LLP
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) Case No. C10-03856-PJH

) **STIPULATION AND ORDER**
) **REGARDING DEFENDANT COHEN &**
) **STEERS' ADDITIONAL WRITTEN**
) **INTERROGATORIES TO PLAINTIFF**
) **JANET HALEY**

1 Plaintiff Janet Haley (“Haley”) and Defendants Cohen & Steers Capital Management,
2 Inc. (“Cohen & Steers”) and David Edlin (“Edlin”) (collectively, “Defendants”) (collectively,
3 “the Parties”), by and through their respective counsel, hereby stipulate as follows:

4 WHEREAS, Defendant Cohen & Steers issued twenty-five (25) written interrogatories to
5 Plaintiff Janet Haley, the maximum permitted without an agreement among the parties or court
6 order under Federal Rule of Civil Procedure 33, before Plaintiff disclosed her employment with
7 Advisors Asset Management, Inc. The Parties acknowledge there is good cause for Defendant
8 Cohen & Steers to issue additional written interrogatories to Plaintiff regarding her employment.

9 IT IS HEREBY STIPULATED AND AGREED by and among the Parties, through their
10 respective undersigned counsel, that Defendant Cohen & Steers shall be permitted to issue six
11 (6) additional written interrogatories to Plaintiff Janet Haley regarding her employment with
12 Advisors Asset Management., Inc. The Parties further agree that Defendant Cohen & Steers will
13 not subpoena Plaintiff’s employment records from Advisors Asset Management, Inc. provided
14 that she provides full and complete responses to its interrogatories. The Parties further agree that
15 should Defendant Cohen & Steers contend that Plaintiff has not provided full and complete
16 responses to its interrogatories, Defendant Cohen & Steers will meet and confer with Plaintiff
17 before issuing a subpoena for Plaintiff’s employment records from Advisors Asset Management,
18 Inc.

19 IT IS SO STIPULATED.

20 DATED: November 17, 2011

SEYFARTH SHAW LLP

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23 By /S/ Andrea N. de Koning
Andrea N. de Koning
24 Attorneys for Defendant
COHEN & STEERS CAPITAL
25 MANAGEMENT, INC.
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1 DATED: November 17, 2011

SHEA LAW OFFICES

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By /S/ Mary Shea Hagebols
Mary Shea Hagebols
Attorney for Plaintiff Janet Haley

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6 DATED: November 17, 2011

VAN DE POEL LEVY & ALLEN LLP

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By /S/ Jeffrey William Allen
Jeffrey William Allen
Attorneys for Plaintiff Janet Haley

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11 DATED: November 17, 2011

AKIN GUMP STRAUSS HAUER & FELD
LLP

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By /S/ Catherina A. Conway
Catherine A. Conway
Attorneys for Defendant David Edlin

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ORDER

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It is hereby ORDERED that Defendant Cohen & Steers shall be permitted to issue six (6) additional written interrogatories to Plaintiff Janet Haley regarding her employment with Advisors Asset Management., Inc., pursuant to Rule 33 of the Federal Rules of Civil Procedure and the terms of the above stipulation.

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IT IS SO ORDERED.

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DATED: 11/23/11

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