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*Attorneys for Plaintiff*

17 **UNITED STATES DISTRICT COURT**  
 18 **NORTHERN DISTRICT OF CALIFORNIA**

19 BRADLEY COOPER, Individually and On  
 20 Behalf of All Others Similarly Situated,

Plaintiffs,

v.

23 THORATEC CORPORATION, GERHARD F.  
 24 BURBACH, TAYLOR C. HARRIS, and  
 ROXANNE OULMAN,

Defendants.

Case No. 4:14-cv-00360-CW

**[PROPOSED] ORDER**

DATE: May 1, 2014

TIME: 2:00 p.m.

JUDGE: Honorable Claudia Wilken

CTRM: 2 – 4th Floor



1           4.       No motion, request for discovery, or other pretrial proceedings shall be initiated or filed  
2 by any plaintiff without the approval of Lead Counsel, so as to prevent duplicative pleadings or  
3 discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of Lead  
4 Counsel.

5           5.       Counsel in any related action that is consolidated with this action shall be bound by this  
6 organization of plaintiffs' counsel.

7           6.       Lead Counsel shall have the responsibility of receiving and disseminating Court orders  
8 and notices.

9           7.       Lead Counsel shall be the contact between plaintiffs' counsel and defendants' counsel,  
10 as well as the spokesperson for plaintiffs' counsel, and shall direct and coordinate the activities of  
11 plaintiffs' counsel.  
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13           8.       Defendants shall effect service of papers on plaintiffs by serving a copy of same on Lead  
14 Counsel by overnight mail service, electronic or hand delivery. Plaintiffs shall effect service of papers  
15 on defendants by serving a copy of same on defendants' counsel by overnight mail service, electronic  
16 or hand delivery.  
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18           9.       During the pendency of this litigation, or until further order of this Court, the parties  
19 shall take reasonable steps to preserve all documents within their possession, custody, or control,  
20 including computer-generated and stored information, and materials such as computerized data and  
21 electronic mail, containing information which is relevant or which may lead to the discovery of  
22 information relevant to the subject matter of the pending litigation.  
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**SO ORDERED.**

Dated: April 21, 2014

  
Honorable Claudia Wilken  
United States District Judge  
Northern District of California