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Attorneys for Plaintiff Cadence Design Systems, Inc.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CADENCE DESIGN SYSTEMS, INC., *a*
Delaware Corporation,

Plaintiff,

v.

POUNCE CONSULTING, INC.,
a California Corporation, and POUNCE
CONSULTING, S.A. de C.V., *a Mexican*
Sociedad Anónima de Capital Variable.

Defendants.

Case No. 4:17-cv-04732-PJH

**STIPULATION AND [PROPOSED]
ORDER RE DOCUMENT PRODUCTION**

Mag. Judge: Hon. Elizabeth D. Laporte

DISCOVERY MATTER

STIPULATION AND [PROPOSED ORDER] RE DOCUMENT
PRODUCTION

4:17-cv-04732-PJH

1 Plaintiff Cadence Design Systems, Inc. (“Cadence”) and Defendant Pounce Consulting,
2 Inc. (“Pounce USA”) (collectively, “the Parties”) by and through their respective counsel of
3 record, hereby stipulate as follows:

4 WHEREAS on November 8, 2018, Judge Laporte found that “the emails and other
5 documents of Roger Viera are in the possession, custody, and/or control of [Pounce USA],
6 regardless of whether the documents are housed on a server in Mexico, given that Mr. Viera is an
7 officer and majority owner of Pounce USA and given that Mr. Viera used these email accounts
8 to direct the business of Pounce USA,” and ordered Pounce USA to “search for and produce all
9 documents of Roger Viera that are responsive to Cadence’s documents requests, including any
10 emails housed on the server in Mexico.” (Dkt. No. 189).

11 It is hereby agreed and stipulated among the Parties as follows:

- 12 1. Pounce USA will produce all documents in compliance with the Court’s
13 November 8, 2018 Order by January 7, 2019.
- 14 2. In connection with this production, within 7 days of this Stipulation, Pounce USA
15 will provide to Cadence proposed ESI search terms and a protocol for collecting,
16 searching, and producing ESI.
- 17 3. Within 7 days of Pounce USA proposing ESI search terms, Cadence and Pounce
18 USA will meet and confer on the ESI search terms and production protocol.
- 19 4. Paragraphs 2 and 3 of this Stipulation do not relieve Pounce USA’s obligation to
20 produce non-ESI documents.
- 21 5. Pounce USA will comply with its legal obligations to preserve evidence and will
22 not remove or delete any responsive documents to avoid production.

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24 [Continued on Next Page]
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1 DATED: December 13, 2018

2 By: /s/ Guy Ruttenberg

3 Guy Ruttenberg
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15 *Attorneys for Plaintiff*

16 DATED: December 13, 2018

17 By: /s/ Janie Lin Thompson

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Attorneys for Defendant Pounce Consulting, Inc.

29 I, Guy Ruttenberg, hereby certify that the content of this document is acceptable to all
30 persons required to sign this document and that I obtained the authorizations necessary for the
31 electronic signatures of all parties for this document.

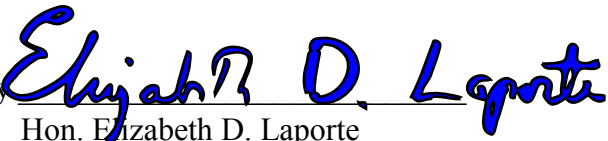
32 /s/ Guy Ruttenberg

33 Guy Ruttenberg

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 13, 2018

By 
Hon. Elizabeth D. Laporte
United States Magistrate Judge

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Executed on December 13, 2018 in Los Angeles, California.

By: /s/ Guy Ruttenberg
GUY RUTTENBERG