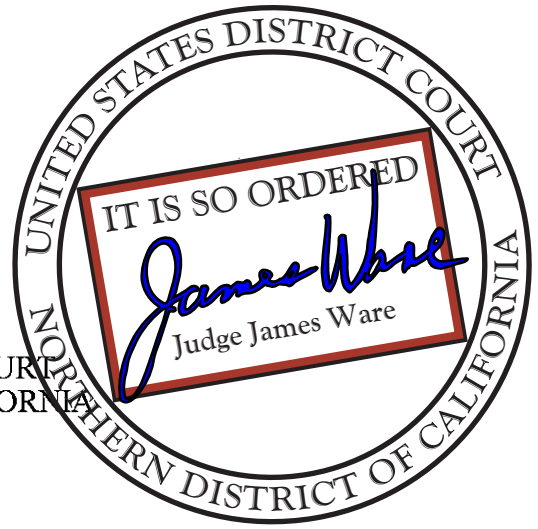


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9 Attorneys for the Plaintiffs  
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11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA

13 **SARAH PEREZ;** )  
 14 **MICHELLE LACKNEY;** )  
 15 **RACHEL STEWART;** )  
 16 **RACHEL HARDYCK,** )  
 17 on behalf of themselves and all others )  
 18 similarly situated, )

19 Plaintiffs, )

20 v. )

21 **STATE FARM MUTUAL AUTOMOBILE** )  
 22 **INS. CO.,** an Illinois corporation; )  
 23 **ALLSTATE INDEMNITY CO.,** an Illinois )  
 24 corporation; )  
 25 **GEICO GENERAL INSURANCE CO.,** )  
 26 a Maryland corporation; )  
 27 **CERTIFIED AUTOMOTIVE PARTS ASS=N.,** )  
 28 a Delaware corporation )  
 29 **LIBERTY MUTUAL FIRE INS CO.,** )  
 30 a Massachusetts corporation; and )

31 Defendants. )

CASE NO. CO6-1962 (JW) (PSG)

**STIPULATION AND ORDER  
 AS TO CONFIDENTIALITY  
 OF DATA PRODUCED BY  
 CCC INFORMATION  
 SERVICES, INC. AND  
 MITCHELL INTERNATIONAL,  
 INC.**

1           Herein the Parties seek a stipulation as to the confidentiality of certain third-party discovery  
2 and show the Court as follows:

3  
4           1.       In May of 2011, Plaintiffs served document subpoenas under the authority of the  
5 United States District Court for the Northern District of Illinois and the United States District Court  
6 for the Southern District of California on CCC Information Services, Inc. (“CCC”) and Mitchell  
7 International Inc. (“Mitchell”), respectively, seeking data as to repair-parts usage in part for purposes  
8 of modeling alleged class-wide antitrust pricing injury for asserted members of the proposed State  
9 Farm and GEICO Classes.  
10

11           2.       After receipt of Doc. 581 Plaintiffs negotiated independently with CCC and Mitchell  
12 to limit the production at this time to that they believe needed to support the class certification  
13 motion and as limited by the Court’s Order of November 29, 2011.  
14

15           3.       CCC and Mitchell have asked that the parties treat all data respectively produced by  
16 CCC or Mitchell as “Highly Confidential/Outside Counsel Only” under Paragraphs 1.4 *et seq.* of the  
17 Protective Order in this matter (Docket No. 376) and the Parties concur.  
18

19           4.       By making the production, the Parties also stipulate that neither CCC nor Mitchell  
20 International are subjecting themselves to the jurisdiction of this Court for purposes of the  
21 enforcement of the subpoenas or otherwise.  
22

23           IT IS SO STIPULATED ON DECEMBER 14, 2011.  
24  
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27  
28

1 **By //s//** \_\_\_\_\_

2 **On Behalf of All Plaintiffs**

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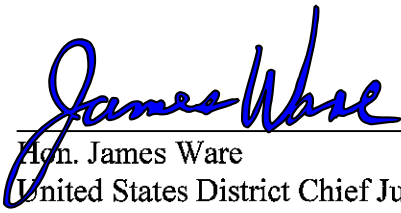
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LIBERTY MUTUAL FIRE INSURANCE  
COMPANY

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**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 15, 2011 \_\_\_\_\_

  
\_\_\_\_\_  
Hon. James Ware  
United States District Chief Judge