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12 Attorneys for Plaintiff

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 STEPHANIE LENZ,

17 Plaintiff,

18 v.

19 UNIVERSAL MUSIC CORP., UNIVERSAL
 20 MUSIC PUBLISHING, INC., and
 21 UNIVERSAL MUSIC PUBLISHING
 GROUP,

22 Defendants.

Case No. C 07-03783-JF

**JOINT STIPULATION AND
 [PROPOSED] ORDER RE CASE
 MANAGEMENT SCHEDULE**

Judge: The Hon. Jeremy Fogel

1 Plaintiff Stephanie Lenz (“Plaintiff”) and Defendants Universal Music Corp., Universal
2 Music Publishing, Inc. and Universal Musical Publishing Group (“Universal”), by and through
3 their respective counsel of record, hereby declare and stipulate as follows:

4 WHEREAS, the parties previously filed opening motions for summary judgment on
5 October 18, 2010;

6 WHEREAS, the Court on September 22, 2011 administratively terminated the cross-
7 motions for summary judgment pending the determination of the then-pending Motion for
8 Contempt before Magistrate Judge Lloyd;

9 WHEREAS, Magistrate Judge Lloyd on March 1, 2012 issued his Order granting in part
10 and denying in part the Motion for Contempt;

11 WHEREAS, the Parties had previously agreed to defer the further deposition of Plaintiff,
12 ordered by Magistrate Judge Trumbull in the Order of October 22, 2010, pending Magistrate
13 Judge Lloyd’s ruling;

14 WHEREAS, the Parties have met and conferred, have reached an agreement as to an
15 orderly schedule for the supplemental deposition of Plaintiff and the re-filing and further briefing
16 of respective motions for summary judgment, and have cleared with Chambers the Court’s
17 availability to hear the summary judgment motions;

18 **ACCORDINGLY, THE PARTIES STIPULATE AS FOLLOWS:**

19 [1] Defendants shall take the deposition of Plaintiff in accordance with Magistrate Judge

20 Trumbull’s October 22, 2010 Order at the offices of Munger, Tolles & Olson LLP in

21 San Francisco, on **Thursday, June 28, 2012, at 10 a.m.**

22 [2] The Parties shall file any motions for summary judgment by **Friday, July 13, 2012.**

23 [3] The Parties shall file any oppositions to motions for summary judgment by **Friday,**

24 **August 24, 2012.**

25 [4] The Parties shall file any replies in support of motions for summary judgment by

26 **Wednesday, September 26, 2012.**

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[5] The Parties shall appear before the Court for a hearing regarding any motions for summary judgment on **Wednesday, October 17, 2012**

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motion for summary judgment on certain of Universal’s affirmative defenses; and
(10) July 16, 2010 (Docket No. 291), modifications to case management schedule;
(11) November 4, 2010 (Docket No. 349), modifications to case management schedule;
(12) March 11, 2011 (Docket No. 381), modifications to case management schedule.

c) Pursuant to Civil Local Rule 6-2(a)(3), the parties state that the requested time modifications will not affect any dates currently scheduled.

IT IS SO STIPULATED.

Dated: April 10, 2012 ELECTRONIC FRONTIER FOUNDATION

By: /s/ Julie Samuels*
JULIE SAMUELS
Attorneys for Plaintiff
STEPHANIE LENZ

Dated: April 10 , 2012 MUNGER, TOLLES & OLSON LLP


By: /s/ Kelly M. Klaus
KELLY M. KLAUS
Attorneys for Defendants
UNIVERSAL MUSIC CORP.,
UNIVERSAL MUSIC PUBLISHING,
INC. and UNIVERSAL MUSIC
PUBLISHING GROUP

* Electronically signed by Defendants’ counsel with the concurrence of Plaintiff’s counsel. N.D. Cal. G.O. 45 ¶ X.B.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

By: 

HON. JEREMY FOGEL
United States District Judge