

1 ELECTRONIC FRONTIER FOUNDATION  
 2 FRED VON LOHMANN #192657  
 KURT OPSAHL #191303  
 3 CORYNNE MCSHERRY #221504  
 454 Shotwell Street  
 3 San Francisco, CA 94110  
 Telephone: (415) 436-9333  
 4 Facsimile: (415) 436-9993  
 Email: fred@eff.org; kurt@eff.org  
 5 corynne@eff.org

\*E-Filed 4/16/09\*

6 KEKER & VAN NEST, LLP  
 ASHOK RAMANI - #200020  
 7 MICHAEL KWUN - #198945  
 MELISSA J. MIKSCH - #249805  
 8 710 Sansome Street  
 San Francisco, CA 94111-1704  
 9 Telephone: (415) 391-5400  
 Facsimile: (415) 397-7188  
 10 Email: aramani@kvn.com; mkwun@kvn.com  
 Email: mmiksch@kvn.com

11 FOLGER LEVIN & KAHN LLP  
 12 MICHAEL F. KELLEHER  
 SUZANNE ELIZABETH RODE  
 13 275 Battery Street, Suite 2300  
 San Francisco, CA 94111  
 14 Telephone: (415) 986-2800  
 Facsimile: (415) 986-2827  
 15 Email: mkelleher@flk.com; srode@flk.com

16 Attorneys for Plaintiff  
 17 STEPHANIE LENZ

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA  
 20 SAN JOSE DIVISION

21 STEPHANIE LENZ,

Plaintiff,

23 v.

24 UNIVERSAL MUSIC CORP., UNIVERSAL  
 MUSIC PUBLISHING, INC., and  
 25 UNIVERSAL MUSIC PUBLISHING  
 GROUP,

26 Defendants.

Case No. C 07-03783-JF

**STIPULATION AND ~~PROPOSED~~  
 ORDER TO SHORTEN TIME ON  
 BRIEFING SCHEDULE REGARDING  
 PLAINTIFF'S MOTION FOR ENTRY OF  
 A PROTECTIVE ORDER**

Date: N/A  
 Time: N/A  
 Judge: The Hon. Richard G. Seeborg  
 Courtroom: 4

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

4 WHEREAS, contemporaneous with the filing of this Stipulation, Plaintiff is filing a  
5 Motion for Entry of a Protective Order (“Motion”);

6 WHEREAS, Defendants have indicated that they will oppose the Motion but will  
7 stipulate to the time modifications on the briefing schedule set by the Civil Local Rules as set  
8 forth below;

9 WHEREAS, pursuant to Civil Local Rule 6-2(a)(1), the parties state that the time  
10 modifications set forth below are requested for the following reason:

11 Plaintiff has requested, and Defendants have agreed, that Plaintiff’s Motion for Entry of a  
12 Protective Order can be briefed on a modified schedule. The parties have agreed to stipulate to a  
13 shortened briefing schedule (as set forth below), under which briefing would be completed by  
14 Friday, April 25, 2009;

15 WHEREAS, pursuant to Civil Local Rule 6-2(a)(2), the parties disclose that there have  
16 been five previous stipulated time modifications in this case (August 20, 2007 [Docket No. 8],  
17 October 11, 2007 [Docket No. 19], November 16, 2007 [Docket No. 26], April 30, 2008 [Docket  
18 No. 35], and August 29, 2008 [Docket No. 46]). These modifications related to the briefing  
19 schedules and hearing dates for the prior Motions to Dismiss and Motion to Certify, and/or the  
20 date for the Case Management Conference; and

21 WHEREAS, pursuant to Civil Local Rule 6-2(a)(3), the parties state that the requested  
22 time modifications herein would have no effect on the schedule for the case other than to shorten  
23 the time for briefing on Plaintiff’s Motion;

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

25 The briefing schedule for Plaintiff’s Motion shall be:

26 [a] Motion: Thursday, April 9, 2009

27 [b] Opposition: Monday, April 20, 2009

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

[c] Reply: Friday, April 24, 2009

The Parties respectfully request that, upon the filing of the Reply, the Court set Plaintiff's Motion for argument on the Court's first available hearing date. The Parties would be amenable to conducting argument in person or by telephone conference, as the Court prefers.

**IT IS SO STIPULATED.**

Dated: April 9, 2009

ELECTRONIC FRONTIER  
FOUNDATION  
  
KEKER & VAN NEST, LLP  
  
FOLGER LEVIN & KAHN LLP

By:           /s/ Melissa J. Miksch            
MELISSA J. MIKSCH  
Attorneys for Plaintiff  
STEPHANIE LENZ


Dated: April 9, 2009

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

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: April 15, 2009

By:                       
HON. RICHARD G. SEEBORG  
United States Magistrate Judge

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