

1 *See attached list of counsel*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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SAN JOSE DIVISION

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SEAGATE TECHNOLOGY LLC,

CASE NO. C 07-5700 JW (PVT)

12

Plaintiff,

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING HEARING DATE ON
SEAGATE'S MOTION TO COMPEL THE
PRODUCTION OF DOCUMENTS AND
DISCOVERY RESPONSES FROM
NATIONAL UNION**

13

v.

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NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, a
Pennsylvania corporation,

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Defendant.

[Civil L.R. 6-1(b), 6-2, and 7-12]

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11 Attorneys for Plaintiff
12 SEAGATE TECHNOLOGY LLC

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1 Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, plaintiff Seagate Technology LLC
2 (“Seagate”) and defendant National Union Fire Insurance Company of Pittsburgh, PA (“National
3 Union”) file this Stipulation and [Proposed] Order continuing the hearing date on Seagate’s
4 motion to compel the production of documents and discovery responses from National Union.

5 On July 1, 2009, Seagate filed a motion to compel the production of documents and
6 discovery responses from National Union. *See* Docket Item No. 157. July 1, 2009 was the
7 deadline to file motions to compel under the Court’s Scheduling Order and Civil L.R. 26-2. *See*
8 Docket Item No. 72; Civil L.R. 26-2. Seagate set the motion to be heard on August 11, 2009.
9 *See* Docket Item No. 157. National Union’s has filed a motion to extend time to respond to
10 interrogatories and request for production of documents pursuant to F.R.C.P. 6(b) and for relief
11 from inadvertent waiver. *See* Docket Item No. 156. That motion is currently scheduled to be
12 heard on August 18, 2009. *Id.*

13 On July 2, 2009, National Union’s informed Seagate that because of conflicts, National
14 Union’s counsel will not be available on August 11, 2009, and asked Seagate to stipulate to
15 continue the hearing to August 18, 2009. Seagate did not object to continuing the hearing by one
16 week. Accordingly, the parties hereby stipulate to continuing the hearing date on Seagate’s
17 motion to compel from **August 11, 2009 at 10:00 a.m.** to **August 18, 2009 at 10:00 a.m.** The
18 parties further stipulate to file all moving papers according to the schedule established by the
19 Court’s Local Rules.

20 **IT IS SO STIPULATED.**

21 Dated: July 8, 2009

ORRICK, HERRINGTON & SUTCLIFFE, LLP

22 /s/ Daniel J. Weinberg /s/

23 Daniel J. Weinberg
24 Attorneys for Plaintiff
SEAGATE TECHNOLOGY LLC

25 Dated: July 8, 2009

LEWIS BRISBOIS BISGAARD & SMITH LLP

26 /s/ Stephen V. Kovarik /s/

27 Stephen V. Kovarik
28 Attorneys for Defendant
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA

