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

21 MEDIMMUNE, LLC,
 22 Plaintiff,
 23 v.
 24 PDL BIOPHARMA, INC.,
 25 Defendant.

Case No. C 08-5590 JF

**STIPULATED REQUESTED AND
 PROPOSED ORDER TO SHORTEN TIME
 FOR BRIEFING AND HEARING ON PDL'S
 MOTION FOR PROTECTIVE ORDER**

Requested Hearing Date: December 22, 2009
 Time: 10:00 a.m.

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 STIPULATED REQUEST AND
~~PROPOSED~~ ORDER TO SHORTEN
 TIME RE: PDL'S MOTION FOR P.O.

1 IT IS HEREBY STIPULATED AND AGREED by and between plaintiff
2 MedImmune, LLC (“MedImmune”) and defendant PDL BioPharma, Inc. (“PDL”) (each, a
3 “Party” and collectively, the “Parties”) to the above-captioned litigation as follows:

4 1. Whereas PDL filed on November 20, 2009 a Motion for Protective Order
5 (“PDL’s Motion”). PDL’s Motion seeks a protective order from the Court forbidding and
6 limiting certain topics noticed in MedImmune’s First Notice of Deposition of PDL Pursuant to
7 Fed. R. Civ. P. 30(b)(6) (“MedImmune’s 30(b)(6) Notice”).

8 2. Whereas MedImmune served its 30(b)(6) Notice on November 6, 2009,
9 containing 24 topics and seeking deposition of PDL on December 10, 2009, and PDL served its
10 responses and objections thereto on November 13, 2009.

11 3. Whereas the Parties have met and conferred in good faith but cannot
12 resolve their dispute.

13 4. Whereas immediate resolution of the dispute will determine what topics
14 MedImmune may pursue and the scope of the Parties’ preparation therefor.

15 5. Whereas the close of fact discovery in this case is January 13, 2009; as a
16 result, hearing under the Court’s normal 35-day schedule would leave the Parties only around two
17 weeks to prepare for and conduct the deposition pursuant to the Court’s decision.

18 6. Whereas the below requested time modification would set hearing one
19 week earlier than under the normal 35-day schedule, but still provides the Court with two weeks
20 between the receipt of all briefing and hearing. The instant request affects the date for PDL’s
21 Motion only and has no effect on the rest of the schedule otherwise in place in this case.

22 7. The Parties agree, subject to the Court’s approval, to modify the briefing
23 and hearing schedule for PDL’s Motion as set forth below:

24 MedImmune’s opposition to the motion, if any, be filed by **December 3, 2009**, and
25 limited to 15 pages.

26 PDL’s reply brief, if any, be filed by **December 8, 2009**, and limited to 5 pages.

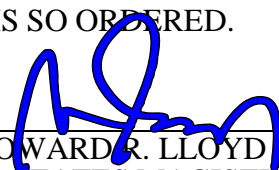
27 A hearing on this matter will be held on **December 22, 2009**.

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 30, 2009



HON. HOWARD R. LLOYD
UNITED STATES MAGISTRATE JUDGE