1	subject to court approval, that the briefing and hearing schedule with respect to Plaintiffs'		
2	Motion for Protective Order Forbidding Deposition of Third Party Ivan Ariza ("Motion for		
3	Protective Order") be accele	rated, and in support of this stipulation state as follows: On March 4,	
4	2010, the Dell Defendants is	ssued a subpoena to third party Ivan Ariza, noticing his deposition for	
5	March 19, 2010 in northern	Virginia. Plaintiffs have filed the Motion for Protective Order	
6	concurrently herewith on the	e grounds that Mr. Ariza is a former employee of Plaintiffs' counsel,	
7	and as such, there are no nor	aprivileged, relevant areas of inquiry for his deposition. If Plaintiffs	
8	are entitled to a protective order forbidding the deposition of Mr. Ariza, the Motion must be		
9	heard and granted prior to th	e deposition in order to excuse Mr. Ariza's appearance. In order to	
10	allow the parties an adequate	e opportunity to brief whether Mr. Ariza's deposition should go	
11	forward, the Dell Defendant	s have agreed to continue Mr. Ariza's deposition date to March 26,	
12	2010. The parties therefore agree, subject to the Court's approval, that the Motion for Protective		
13	Order will be heard on March 23, 2010, and the briefing schedule for the Motion for Protective		
14	Order will be accelerated as follows:		
15	March 10, 2010:	Filing Date for Plaintiffs' Motion for Protective Order	
16	March 16, 2010:	Filing Date for Dell Defendants' Opposition to Motion for	
17		Protective Order	
18	March 19, 2010:	Filing Date for Plaintiffs' Reply in Support of Motion for	
19		Protective Order	
20	DATED: March 10, 2010	Respectfully Submitted, STRANGE & CARPENTER	
21			
22		By: /s/ Gretchen Carpenter	
23		Attorneys for Plaintiffs	
24	DATED: March 10, 2010	Respectfully Submitted,	
25	DATED. Water 10, 2010	REEVES & BRIGHTWELL, LLP	
26		By: <u>/s/</u>	
27		Matt Frederick Attorneys for Dell Defendants	
28		Thomeys for Den Defendants	

1 2	PURSUANT TO STIPULATION THE ABOVE-REFERENCED ACCELERATED BRIEFING SCHEDULE IS SO ORDERED:
3	DATED: March 12, 2010 Patricia V. Fundade
4	Hon. Patricia V. Trumball
5	United States Magistrate Judge
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