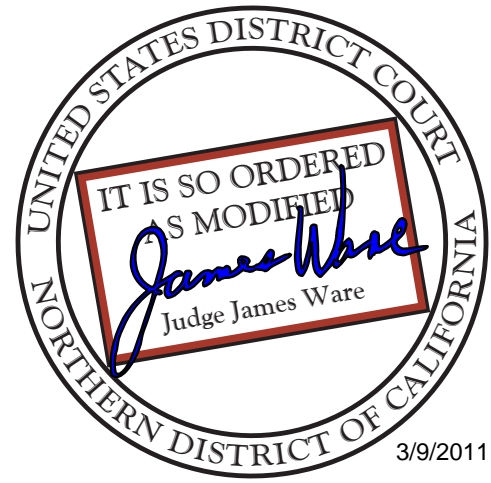


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6 *Plaintiff's Lead Counsel*



7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **SAN JOSE DIVISION**

11 In re Intel Laptop Battery Litigation

Case No. 09-CV-02889-JW (PSG)

12 **STIPULATION AND [PROPOSED] ORDER**
 13 **REGARDING DISCOVERY RESPONSES**
 14 **AND MOTIONS**

15 Complaint Filed: June 26, 2009
 16 Trial Date: None
 Discovery Cutoff: February 28, 2011

1 Plaintiff Dart Seasonal Products, Inc. ("Plaintiff") and Defendant Intel Corporation ("Intel")
2 hereby stipulate as follows:

3 WHEREAS, the deadline for Plaintiff to respond to Intel's First Set of Document Requests to
4 Plaintiff Dart Seasonal Products, Inc. and First Set of Interrogatories to Plaintiff Dart Seasonal Products,
5 Inc. is February 28, 2011 and the court-ordered close of discovery is also on February 28, 2011; and

6 WHEREAS, Plaintiff requires additional time to respond to Intel's First Set of Document
7 Requests to Plaintiff Dart Seasonal Products, Inc. and First Set of Interrogatories to Plaintiff Dart
8 Seasonal Products, Inc.;

9 NOW THEREFORE, Plaintiff and Intel stipulate that:

10 Plaintiff will serve full and complete responses to Intel's First Set of Document Requests Nos. 3,
11 4, and 5, and produce any responsive documents, by March 18, 2011, and serve full and complete
12 responses to the remainder of the document requests and any responsive documents by April 4, 2011;

13 Plaintiffs will serve full and complete responses to Intel's First Set of Interrogatories Nos. 14, 15,
14 and 16 by March 18, 2011, and serve full and complete responses to the remainder of the interrogatories
15 by April 4, 2011;

16 Intel will have up through and including April 11, 2011 to file a discovery motion, if necessary,
17 regarding Plaintiff's responses to Intel's First Set of Document Requests and First Set of Interrogatories
18 to Plaintiff Dart Seasonal Products, Inc.

19
20 Respectfully submitted,

21 Dated: February 28, 2011

GIRARD GIBBS LLP

22
23 By: /s/ Geoffrey A. Munroe

24 Eric H. Gibbs
25 601 California Street, 14th Floor
26 San Francisco, CA 94108
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Plaintiff's Lead Counsel

1 Dated: February 28, 2011

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2 By: /s/ Anthony L. Marks

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Attorneys for Defendant Intel Corporation

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1 **ORDER**

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

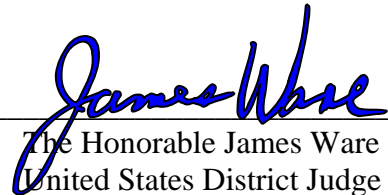
3 Plaintiff will serve full and complete responses to Intel's First Set of Document Requests Nos. 3,
4 4, and 5, and produce any responsive documents, by March 18, 2011, and serve full and complete
5 responses to the remainder of the document requests and any responsive documents by April 4, 2011;

6 Plaintiff will serve full and complete responses to Intel's First Set of Interrogatories Nos. 14, 15,
7 and 16 by March 18, 2011, and serve full and complete responses to the remainder of the interrogatories
8 by April 4, 2011;

9 Intel will have up through and including April 11, 2011 to file a discovery motion regarding
10 Plaintiff's responses to Intel's First Set of Document Requests and First Set of Interrogatories to
11 Plaintiff Dart Seasonal Products, Inc.

12 This Stipulation shall not modify any other deadlines set in the Court's Case Schedule.

13
14 DATED: _____ March 9 _____, 2011



The Honorable James Ware
United States District Judge