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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

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ARIBA, INC., a Delaware corporation

CASE NO. C09 04495 RS

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Plaintiff,

**STIPULATION AND ~~PROPOSED~~
ORDER**

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vs.

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NATIONAL GRID CORPORATION OF
THE PHILIPPINES, a Philippines
corporation,

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Defendant.

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Plaintiff ARIBA, INC. and defendant NATIONAL GRID CORPORATION OF THE
PHILIPPINES ("NGCP") hereby stipulate to the following pretrial deadlines for the reasons and
upon the terms and conditions set forth below:

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PREMISES

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A. On May 27, 2010, this Court issued its Case Management Scheduling Order.

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B. Since that date, Ariba has worked diligently to obtain additional documents from

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NGCP and to take the depositions of the persons currently or formerly with NGCP who were
involved in the dispute that is the subject of this lawsuit.

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C. NGCP has appointed a new management team for the company. It has taken
some time for NGCP's counsel to educate the new management team about this dispute and
NGCP's obligations in connection with the United States judicial system and this case.

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1 D. Within the past two weeks, NGCP's counsel personally met with NGCP
2 management in Manila, Philippines to discuss NGCP's obligations in connection with this case.

3 E. NGCP is now prepared to produce such additional documents as it might have,
4 and to make its personnel available for deposition.

5 **STIPULATION**

6 WHEREFORE, Ariba and NGCP hereby stipulate as follows:

7 1. The deposition of NGCP's records custodian shall take place not later than August
8 13, 2010. The depositions of any other NGCP current or former personnel will take place not
9 later than August 31, 2010.

10 2. Depositions of Ariba personnel will take place after the depositions of NGCP
11 personnel have concluded.

12 3. The parties will hold a settlement conference with Judge Lloyd on September 15,
13 16 or 17, 2010.

14 4. The last date for hearing pre-trial motions shall be moved from September 8, 2010
15 to September 23, 2010.

16 DATED: August 2, 2010

SEDGWICK, DETERT, MORAN & ARNOLD LLP

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18 By: /s/ Randall G. Block
19 Attorneys for Plaintiff Ariba, Inc.

20 DATED: August 2, 2010

LAW OFFICES OF ROMAN P. MOSQUEDA

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22 By: /s/ Roman P. Mosqueda
23 Attorneys for Defendant National Grid Corporation
24 of the Philippines

25 IT IS SO ORDERED. 8/2/10

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27 The Honorable Richard Seeborg
28 United States District Judge