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 15 STEPHEN GOULD CORPORATION

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 REFLEX PACKAGING, INC.,
 19 Plaintiff,
 20 v.
 21 STEPHEN GOULD CORPORATION,
 Defendant.

Case No. 5:10-cv-2909 (LHK)
**STIPULATION REQUESTING ORDER
 SHORTENING TIME TO RESOLVE
 DISPUTE REGARDING CONTENTS OF
 PROTECTIVE ORDER**
(Local Rule 6-2)

23 STEPHEN GOULD CORPORATION,
 24 Counterclaimant,
 25 v.
 26 REFLEX PACKAGING, INC.,
 27 Counter-Defendant.

[Complaint Filed: July 1, 2010]

1 The Parties to this action request that the Court enter an order shortening the time for a
2 hearing on a motion to resolve their dispute regarding the content of a protective order regarding
3 discovery to be entered in this matter. The Parties request that the matter be heard as part of the
4 Court's normal civil law and motion calendar at 10:00 a.m. on February 8, 2011.

5 On January 12, 2011, Judge Koh entered a Minute Order and Case Management Order. In
6 that Order, the Court instructed the parties to submit a stipulated protective order by January 26,
7 2011. The parties have negotiated in good faith, and have been able to resolve most, although
8 not all, issues regarding the protective order. On January 26, the Parties notified Judge Koh
9 (a) that they had not reached an agreement on all items of the protective order, and (b) that the
10 parties would submit their remaining disputes to Magistrate Judge Grewal, who has been assigned
11 to handle discovery regarding the case.

12 As set forth in the accompanying declaration of Michael M. Carlson, the parties seek
13 expedited resolution of their dispute, because Judge Koh has referred the case to an early
14 settlement conference before Magistrate Judge Chen. That settlement conference is set to take
15 place on March 1, 2011. Settlement Conference Statements are to be lodged with Judge Chen no
16 later than February 15. The protective order is necessary to facilitate the exchange of information
17 in advance of the settlement conference and the submission of Settlement Conference Statements.
18 The parties believe that the remaining issues are discrete and that extensive briefing is unnecessary
19 to adequately present their positions to the Court for resolution.

20 As a result, the Parties joint request that the Court enter an order adopting the following
21 schedule:

22 January 28, 2011 Plaintiff's Brief in Support of Motion to Resolve Issues Regarding
23 Content of Protective Order

24 February 1, 2011 Defendant's Opposition Brief

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No reply brief will be filed.

February 8, 2011 Hearing on Motion

Respectfully submitted,

Dated: January 28, 2011

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ Michael M. Carlson

Michael M. Carlson
Attorneys for Plaintiff
Reflex Packaging, Inc.

Dated: January 28, 2011

DRINKER BIDDLE & REATH LLP

By: /s/ Gregory J. Lavorgna

Gregory J. Lavorgna
Attorneys for Defendant
Stephen Gould Corporation

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: January 30, 2011

Paul S. Grewal
Hon. Paul Singh Grewal
UNITED STATES MAGISTRATE JUDGE