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PLAN

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16 Attorneys for Plaintiff  
PAMELA HINZ

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

21 PAMELA HINZ,

22 Plaintiff,

23 v.

24 HEWLETT-PACKARD COMPANY  
DISABILITY PLAN,

25 Defendant.  
26  
27

Case No. CV 10-03633 LHK

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO REMOVE INCORRECTLY  
FILED DOCUMENTS**

28 STIPULATION AND ~~[PROPOSED]~~ ORDER  
TO REMOVE INCORRECTLY FILED  
DOCUMENTS

CASE NO. CV 10-03633 LHK

1 Defendant Hewlett-Packard Company Disability Plan (“Defendant”) and Plaintiff  
2 Pamela Hinz (“Plaintiff”) (jointly “the Parties”), by and through their counsel of record, hereby  
3 agree and stipulate as follows:

4 WHEREAS, on March 10, 2011, Defendant electronically filed its Opposition to  
5 Plaintiff’s Motion for Summary Adjudication of the Standard of Review (“Opposition”) (Document  
6 No. 27 on the docket);

7 WHEREAS, in support of the Opposition, Defendant filed the declaration of Ms.  
8 Janet Curry (Document No. 28 on the docket), which referenced as Exhibit A a copy of the  
9 administrative record for Plaintiff’s claim for benefits at issue in this litigation;

10 WHEREAS, documents contained in Exhibit A to Ms. Curry’s declaration contained  
11 private information governed by Federal Rule of Civil Procedure 5.2(a), including Plaintiff’s social  
12 security number and date of birth;

13 WHEREAS, on March 11, 2011 Plaintiff brought it to Defense counsel’s attention  
14 that Exhibit A included private information by objecting to the inclusion of such private information;

15 WHEREAS, counsel for Defendant promptly contacted the ECF department for the  
16 United States District Court for the Northern District of California and requested that a “lock” be  
17 placed on Document 28 and the exhibits thereto to prevent public access;

18 WHEREAS, the Parties mutually desire to prevent public access to any of the private  
19 information that was contained in Exhibit A to Document No. 28;

20 WHEREAS, Defendant wishes to replace Exhibit A to Document No. 28 with a  
21 redacted version and remove the previously filed unredacted version; and

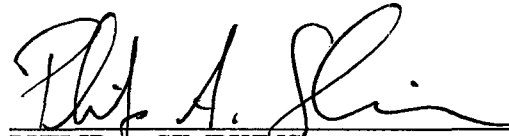
22 WHEREAS, Plaintiff does not oppose this request;

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1            THEREFORE, the Parties hereby stipulate and respectfully request that the Court  
2 order the permanent removal of Document No. 28, including all exhibits thereto, from the Court's  
3 file, to be replaced with a redacted version.

4            IT IS SO STIPULATED.

5  
6 Dated: March 15, 2011



PHILIP A. SIMPKINS  
KIMBERLY J. GOST  
LITTLER MENDELSON  
A Professional Corporation  
Attorneys for Defendant  
HEWLETT-PACKARD COMPANY  
DISABILITY PLAN

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11 Dated: March 15, 2011



CHARLES B. PERKINS  
FLYNN, ROSE & PERKINS  
Attorney for Plaintiff  
PAMELA HINZ

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 15, 2011

  
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THE HONORABLE LUCY H. KOH  
United States District Court Judge