

1 **KESSLER TOPAZ**  
 2 **MELTZER & CHECK, LLP**  
 3 Stacey M. Kaplan (Bar No. 241989)  
 4 One Sansome Street, Suite 1850  
 5 San Francisco, CA 94104  
 6 Telephone: (415) 400-3000  
 7 Facsimile: (415) 400-3001

8 -and-

9 Sean M. Handler (*Pro Hac Vice*)  
 10 Matthew L. Mustokoff (*Pro Hac Vice*)  
 11 Ryan T. Degnan (*Pro Hac Vice*)  
 12 Margaret E. Onasch (*Pro Hac Vice*)  
 13 Daniel C. Mulveny (*Pro Hac Vice*)  
 14 280 King of Prussia Road  
 15 Radnor, PA 19087  
 16 Telephone: (610) 667-7706  
 17 Facsimile: (610) 667-7056

18 *Interim Co-Class Counsel*

19 **MAYER BROWN LLP**  
 20 Edward D. Johnson (SBN 189475)  
 21 wjohnson@mayerbrown.com  
 22 Donald M. Falk (SBN150256)  
 23 dfalk@mayerbrown.com  
 24 Eric B. Evans (SBN 232476)  
 25 eevans@mayerbrown.com  
 26 Dominique-Chantale Alepin (SBN 241648)  
 27 dalepin@mayerbrown.com  
 28 Two Palo Alto Square, Suite 300  
 3000 El Camino Real  
 Palo Alto, CA 94306-2112  
 Telephone: (650) 331-2000

*Attorneys for Defendant Google Inc.*

29 **UNITED STATES DISTRICT COURT**  
 30 **NORTHERN DISTRICT OF CALIFORNIA**  
 31 **SAN JOSE DIVISION**

32 RICK WOODS, Individually and on Behalf of  
 33 All Others Similarly Situated,

34 Plaintiff,

35 vs.

36 GOOGLE INC.,

37 Defendant.

38 Case No. 11-cv-1263-EJD

39 **JOINT STIPULATION AND**  
 40 **[PROPOSED] ORDER REGARDING**  
 41 **EXPERT DISCOVERY**

1 Plaintiff Rick Woods and Defendant Google Inc., by and through their counsel of record  
2 herein, hereby stipulate and agree, subject to Court approval, to the following regarding the scope  
3 of discovery and testimony relating to experts in this matter:

4 WHEREAS, in order to avoid consuming the parties' and the Court's time and resources  
5 on potential discovery issues relating to experts, the parties have agreed to certain limitations on  
6 the scope of expert-related discovery and testimony in this matter.

7 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant  
8 and subject to Court approval, as follows:

9 The following categories of data, information, or documents need not be disclosed by any  
10 party, and are outside the scope of permissible discovery (including deposition questions):

11 1. Any notes or other writings taken or prepared by or for an expert witness in  
12 connection with this matter, including correspondence or memos to or from, and notes of  
13 conversations with any person, including, but not limited to, the expert's assistants and/or clerical  
14 or support staff, other fact or expert witnesses or non-testifying expert consultants, or attorneys  
15 for the party offering the testimony of such expert witness, unless the expert witness relies on  
16 those notes or other writings in connection with the expert witness' opinions in this matter; and

17 2. Any oral or written communication between an expert witness and any person,  
18 including, but not limited to, the expert's assistants and/or clerical or support staff, other fact or  
19 expert witnesses or non-testifying expert consultants, or attorneys for the party offering the  
20 testimony of such expert witness, unless the expert witness relies on those oral or written  
21 communications in connection with the expert witness' opinions in this matter.

1 **IT IS SO STIPULATED**

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DATED: June 4, 2015

**KESSLER TOPAZ MELTZER & CHECK, LLP**

By:       /s Matthew Mustakoff        
Matthew L. Mustakoff

**NIX, PATTERSON & ROACH, LLP**

By:       /s Brad Seidel        
Brad E. Seidel  
*Interim Co-Lead Class Counsel*

DATED: June 4, 2015

**MAYER BROWN LLP**

By:       /s Edward D. Johnson        
Edward D. Johnson  
*Counsel for Defendant, Google Inc.*

Filer's Attestation: In compliance with General Order 45(X)(B), I hereby attest that concurrence in the filing of this Stipulation has been obtained from Interim Co-Lead Class Counsel, Matthew Mustakoff and Brad Seidel.

      /s/ Edward D. Johnson        
Edward D. Johnson

**IT IS SO ORDERED**

DATED:       6/8/2015      

Honorable Edward J. Davila  
      