| 1        | ALEXANDER COMMUNITY LAW CENTER<br>1030 The Alameda<br>San José, CA 95126<br>Phone: (408) 288-7030<br>Fax: (408) 288-3581 |   |
|----------|--|---|
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| 4        |  |   |
| 5<br>6   | Attorneys for Plaintiff, Blanca Santos   |   |
| о<br>7   | UNITED STATES DISTRICT COURT   |   |
|          | NORTHERN DISTRICT OF CALIFORNIA  |   |
| 8        | (San Jose Division)  |   |
| 9        | BLANCA SANTOS,   | ) Case No.: CV11- 02683 EJD   |
| 10<br>11 | Plaintiff,<br>vs.  | ) STIPULATION REGARDING SKYPE<br>) VIDEO DEPOSITIONS and [PROPOSED] |
| 12       | LVNV FUNDING, LLC,   | ) ORDER   |
| 13       | THE BRACHFELD LAW GROUP, PC, and ERICA BRACHFELD,  | )<br>)  |
| 14       | Defendants.  | )   |
| 15       |  | )   |
| 16       |  |   |
| 17       | Plaintiff Blanca Santos, and Defendant I   | Brachfeld Law Group P.C. (BLG) hereby                               |
| 18       | stipulate, the deposition of the BLG officers, directors, managing agents, employees or agents                           |   |
| 19       | most qualified to testify regarding the subjects listed in the notice of deposition, currently noticed                   |   |
| 20       | for April 2, 2012, shall proceed as follows:   |   |
| 21       | 1. Defendant Brachfeld Law Group, P.C. will produce aforementioned deponents on  |   |
| 22       | April 2, 2012, at 9:00 a.m.  |   |
| 23       | 2. The deposition questioning can be conducted via Skype videoconferencing and/or  |   |
| 24       | telephone but no audio or video recording will be done, other than the official record                                   |   |
| 25       | maintained by the Court Reporter.  |   |
|          |  |   |
|          | STIPULATION REGARDING SKYPE VIDE   | O DEPOSITIONS and [PROPOSED] ORDER<br>1                             |

| 1  | 3. All depositions in this case may be conducted via Skype videoconferencing and/or     |  |
|----|---|--|
| 2  | telephone.  |  |
| 3  |   |  |
| 4  | Date: <u>3/28/2012</u>  |  |
| 5  | ALEXANDER COMMUNITY LAW CENTER  |  |
| 6  |   |  |
| 7  | Navdeep Taunk<br>Certified Law Student*   |  |
| 8  |   |  |
| 9  | Scott Maurer,<br>Supervising Attorney*<br>For Plaintiff BLANCA SANTOS                   |  |
| 10 |   |  |
| 11 | * Pursuant to State Bar Rules Governing the Practical Training of Law Students          |  |
| 12 |   |  |
| 13 | /s/<br>Jon Birdt,<br>For Defendant BRACHFELD LAW GROUP, PC                              |  |
| 14 |   |  |
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| 16 | [Proposed] Order  |  |
| 17 | The Court hereby adopts the stipulation of the parties.                                 |  |
| 18 | IT IS SO ORDERED.   |  |
| 19 | Date: <u>March 29, 2012</u>   |  |
| 20 |   |  |
| 21 | Pore S. Aune<br>U.S. DISTRICT JUDGE   |  |
| 22 | U.S. DISTRICT JUDGE<br>HON. EDWARD J. DAVILA<br>U.S. MAGISTRATE JUDGE<br>PAUL S. GREWAL |  |
| 23 |   |  |
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|    | STIPULATION REGARDING SKYPE VIDEO DEPOSITIONS and [PROPOSED] ORDER $\sim 2$             |  |