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12 Attorneys for Defendants and Counterclaim Plaintiffs

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION
 16

17 GUZIK TECHNICAL ENTERPRISES, INC.
 18 Plaintiff and Counterclaim Defendant,
 19 v.
 20 WESTERN DIGITAL CORPORATION,
 WESTERN DIGITAL TECHNOLOGIES, INC.,
 21 and WESTERN DIGITAL (FREMONT) INC.,
 22 Defendants and Counterclaim Plaintiffs, and
 23 WESTERN DIGITAL (THAILAND) COMPANY
 LIMITED and WESTERN DIGITAL
 24 (MALAYSIA) SDN.BHD,
 25 Defendants.

CASE NO. 5:11-CV-03786-PSG

**STIPULATION AND ~~PROPOSED~~
 ORDER SHORTENING TIME FOR
 BRIEFING AND HEARING ON
 WESTERN DIGITAL'S MOTION TO
 COMPEL PRODUCTION OF
 DOCUMENTS FROM DLA PIPER LLP
 (US)**

Magistrate Judge: Hon. Paul Singh Grewal
Courtroom: 5, 4th Floor

1 Pursuant to Civil Local Rules 6-1, 6-2, 7-12, and related rules, Defendants Western
2 Digital Corporation et al. (collectively, “Western Digital”), and non-party DLA Piper LLP (US)
3 (“DLA Piper”) respectfully request that the Court enter the following stipulation regarding the
4 briefing schedule for Western Digital’s Motion to Compel Production of Documents from DLA
5 Piper LLP (US) (Dkt. No. 147) (“Motion to Compel”).

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7 WHEREAS on January 28, 2013, Western Digital served a Subpoena to Produce
8 Documents on DLA Piper LLP (US) (“the Subpoena”);

9 WHEREAS on February 8, 2013, DLA Piper served timely responses and objections to
10 the Subpoena;

11 WHEREAS on February 22, 2013, Western Digital filed the Motion to Compel with this
12 Court via ECF and served the Motion to Compel upon DLA Piper via email and overnight
13 delivery;

14 WHEREAS pursuant to Local Rule 7-3(a) DLA Piper LLP’s opposition to the Motion to
15 Compel is due on Monday, March 11;

16 WHEREAS pursuant to Local Rule 7-3(c) Western Digital’s reply in support of the
17 Motion to Compel is due on Monday, March 21;

18 WHEREAS the hearing on the Motion to Compel is presently scheduled for Tuesday,
19 April 2 at 10:00 am;

20 WHEREAS the fact discovery cutoff applicable to the underlying matter is May 1, 2013
21 (Dkt. No. 143);

22 WHEREAS Western Digital and DLA have met and conferred and agree to shorten the
23 time for the above briefing schedule and hearing;

24 IT IS HEREBY STIPULATED by and among the parties hereto, through their respective
25 attorneys of record, that:

- 26 • DLA Piper will file and serve its opposition to the Motion to Compel on Friday,
27 March 8;

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- Western Digital will file and serve its reply in support of the Motion to Compel on Friday, March 15;
- The hearing on the Motion to Compel will take place on Tuesday, March 26, at 10:00 am.

Prior Time Modifications

There are no prior time modifications with respect to the Subpoena or the Motion to Compel.

Effect of Requested Modification

These extensions currently under discussion will have no effect on deadlines in the underlying matter.

So Stipulated.

Dated: February 28, 2013

LATHAM & WATKINS, LLP

By: /s/ Gavin M. Masuda

Gavin M. Masuda
Attorneys for Defendants/Counterclaim Plaintiffs
Western Digital Corporation et al.

Pursuant to L.R. 5-1(i)(3), the above signatory attests that concurrence in the filing of this document has been obtained from the signatory below.

Dated: February 28, 2013

DLA Piper LLP (US)

By: /s/ Diana Maltzer

Diana Maltzer
Attorneys for Non-Party DLA Piper LLP (US)

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 1, 2013



HON. PAUL SINGH GREWAL
UNITED STATES MAGISTRATE JUDGE

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PROOF OF SERVICE

I am employed in the County of San Mateo, State of California. I am over the age of 18 years and not a party to this action. My business address is Latham & Watkins LLP, .

On February 28, 2013, I served the following document described as:

STIPULATION AND [PROPOSED] ORDER SHORTENING TIME FOR BRIEFING AND HEARING ON WESTERN DIGITAL'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM DLA PIPER LLP (US)

by serving a true copy of the above-described document in the following manner:

BY ELECTRONIC MAIL

The above-described document was transmitted via electronic mail to the following party on February 28, 2013.

David Priebe
Diana Maltzer
DLA Piper LLP
2000 University Avenue
East Palo Alto, California 94303-2214
Email: david.priebe@dlapiper.com
Email: diana.maltzer@dlapiper.com

The party on whom this electronic mail has been served has agreed in writing to such form of service pursuant to agreement.

BY OVERNIGHT MAIL DELIVERY

I personally deposited a sealed envelope or package containing the document and addressed as set forth below in a post office, mailbox, subpost office, substation, mail chute, or other like facility regularly maintained for receipt of overnight mail by Federal Express in the city of Menlo Park, with delivery fees thereon fully prepaid and/or provided for:

David Priebe
Diana Maltzer
DLA Piper LLP
2000 University Avenue
East Palo Alto, California 94303-2214

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on Feburary 28, 2013, at the city of Menlo Park, CA.


Linda Smith