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8 UNITED STATES DISTRICT COURT
 9
 10 NORTHERN DISTRICT OF CALIFORNIA

11 DAVID ELIAS, an individual, on behalf of
 12 himself, the general public and those similarly situated
 13 Plaintiff,
 14 v.
 15 HEWLETT-PACKARD COMPANY; AND DOES 1
 16 THROUGH 50
 17 Defendants

CASE NO. 5:12-cv-00421

**STIPULATION REGARDING
 DISCOVERY DISPUTE JOINT
 REPORT No. 2
 AND ~~PROPOSED~~ ORDER**

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 19 **WHEREAS**, on May 7, 2014, Plaintiff and Defendant Hewlett Packard Company (“HP”)
 20 filed a Discovery Dispute Joint Report #2 (the “Joint Report”), concerning the scheduling of the
 21 parties’ respective depositions and the inspection of Plaintiff’s Pavilion s5305z desktop computer
 22 [Dkt. #59];

23 **WHEREAS**, following the filing of the Joint Report, the parties continued to meet and
 24 confer regarding the disputed matters set forth in the Joint Report;

25 **WHEREAS**, through these further meet-and-confer efforts, the parties have agreed to a
 26 schedule for the completion of the outstanding depositions and computer inspection;

27 **WHEREAS**, the parties desire to resolve the matters set forth in the Joint Report by
 28 setting forth a stipulated schedule to be approved by the Court;

1 **NOW, THEREFORE, IT IS STIPULATED**, by and between the undersigned parties,
2 through their respective counsel of record, that the outstanding depositions and computer
3 inspection will proceed according to the following schedule, subject to the Court's approval,
4 thereby fully resolving the issues set forth in the Joint Report:

<u>Event</u>	<u>Date</u>
5 Inspection of Plaintiff's s5305z Desktop Computer	May 28, 2014
6 Deposition of Girish Srinivasan, HP's Rule 30(b)(6) Designee 7 on Topics Pertaining to Sales and Marketing	June 6, 2014
8 Depositions of Plaintiff David Elias, and Plaintiff's wife, 9 Kenia Elias	June 12, 2014
10 Deposition of Karl Hassur, HP's Rule 30(b)(6) Designee on 11 Topics Pertaining to Technology	June 13, 2014 ¹

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13 Dated: May 15, 2014

/s/ Seth A. Safier
Seth A. Safier
GUTRIDE SAFIER LLP
835 Douglass Street
San Francisco, California 94114
Attorneys for Plaintiff, David Elias

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18 Dated: May 15, 2014

/s/ Timothy W. Loose
Timothy W. Loose
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Los Angeles, CA 90071
Attorneys for Defendant, Hewlett-Packard Company

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28 ¹ Mr. Hassur currently is scheduled for jury duty from June 2–6. Should Mr. Hassur be selected to serve on a trial that is continuing at the time of his currently scheduled deposition, the parties agree to promptly find an alternative and mutually agreeable date for the deposition to occur.

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3 **~~PROPOSED~~ ORDER**

4 Pursuant to the stipulation of the parties, and **GOOD CAUSE APPEARING**
5 **THEREFOR**, the issues set forth in Discovery Dispute Joint Report No. 2 are resolved and the
6 outstanding discovery shall proceed according to the following schedule:

<u>Event</u>	<u>Date</u>
7 Inspection of Plaintiff's s5305z Desktop Computer	May 28, 2014
8 Deposition of Girish Srinivasan, HP's Rule 30(b)(6) Designee on Topics Pertaining to Sales and Marketing	June 6, 2014
9 Depositions of Plaintiff David Elias, and Plaintiff's wife, Kenia Elias	June 12, 2014
10 Deposition of Karl Hassur, HP's Rule 30(b)(6) Designee on 11 Topics Pertaining to Technology	June 13, 2014 ²

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13 **IT IS SO ORDERED.**

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15 DATED: May 16, 2014

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17 THE HONORABLE HOWARD R. LLOYD
18 UNITED STATES MAGISTRATE JUDGE

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28 to serve on a trial that is continuing at the time of his currently scheduled deposition, the parties
agree to promptly find an alternative and mutually agreeable date for the deposition to occur.