Fred W. Schwinn (SBN 225575) 1 Raeon R. Roulston (SBN 255622) 2 CONSUMER LAW CENTER, INC. 12 South First Street, Suite 1014 3 San Jose, California 95113-2418 Telephone Number: (408) 294-6100 4 Facsimile Number: (408) 294-6190 Email Address: fred.schwinn@sjconsumerlaw.com 5 Attorneys for Plaintiff 6 DEREK BRANDON PICARD 7 8 IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA 9 SAN JOSE DIVISION 10 DEREK BRANDON PICARD, Case No. 5:14-CV-04618-RMW-HRL 11 Plaintiff, STIPULATION REGARDING 12 SETTLEMENT NEGOTIATIONS AND V. **ORDER THEREON** 13 П ABC LEGAL SERVICES, INC., a 14 Washington corporation, MARCOS ANTONIO TEJADA, individually and in his 15 official capacity; and DOES 1 through 10, inclusive, 16 17 Defendants. 18 Whereas, Plaintiff, DEREK BRANDON PICARD, filed the above captioned matter against 19 Defendants, ABC LEGAL SERVICES, INC., and MARCOS ANTONIO TEJADA, on October 15, 20 2014; and 21 Whereas, the parties wish to engage in frank and open settlement negotiations in this case 22 23 without the concern that their settlement efforts will be used for any purpose in this or any other case. 24 Wherefore, it is hereby stipulated by and between the parties through their respective attorneys 25 of record that all communications (i.e., telephone calls, letters, e-mails, etc.) regarding settlement 26 negotiations in this case shall be privileged and confidential, and shall not be used for any purpose 27 whatsoever. It is the intent of the parties that their settlement negotiations will be treated with the same 28 -1-STIPULATION REGARDING SETTLEMENT NEGOTIATIONS AND ORDER THEREON Case No. 5:14-CV-04618-RMW-HRL

1	confidentiality as afforded mediations under Northern District of California ADR L.R. 6-12.
2	IT IS SO STIPULATED.
3	CONSUMER LAW CENTER, INC.
4	
5	Dated: July 6, 2015 By: /s/ Raeon R. Roulston Raeon R. Roulston, Esq.
6	Attorney for Plaintiff
7 8	DEREK BRANDON PICARD
9	WEISBERG & MILLER
10	
11	Dated: July 6, 2015 By: /s/ William S. Weisberg William S. Weisberg, Esq.
12	Attorney for Defendant ABC LEGAL SERVICES, INC.
13	
14	<u>ORDER</u>
15	Based upon the foregoing stipulation and good cause appearing,
16	IT HEREBY ORDERED, that all communications (i.e., telephone calls, letters, e-mails, etc.)
17 18	regarding settlement negotiations in this case shall be privileged and confidential, and shall not be used
19	for any purpose whatsoever. The settlement negotiations of the parties shall be treated with the same
20	confidentiality as afforded meditations under Northern District of California ADR L.R. 6-12.
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22	Dated: Konald M. Whyte
23	The Honorable Ronald M. Whyte United States District Judge
24	Office States District stage
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