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11 *Attorneys for Plaintiff and Counter*
12 *Defendant Rimini Street, Inc., and Counter*
13 *Defendant Seth Ravin*

14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 RIMINI STREET, INC., a Nevada corporation;
17 Plaintiff,
18 v.
19 ORACLE INTERNATIONAL
CORPORATION, a California corporation,
20 Defendant.

Case No 2:14-cv-01699 LRH PAL

**STIPULATED SUPPLEMENTAL
PROTECTIVE ORDER
CONCERNING DOCUMENTS
PRODUCED PURSUANT TO THE
PARTIES' TECHNOLOGY-
ASSISTED REVIEW PROTOCOL**

22 ORACLE AMERICA, INC., a Delaware
23 corporation, *et al.*,
24 Counterclaimants,
25 v.
26 RIMINI STREET, INC., a Nevada corporation,
et al.,
27 Counterdefendants.
28

1 **WHEREAS**, the Court entered a Stipulated Protective Order on May 18, 2015 (Dkt. 58);
2 **WHEREAS**, Plaintiff and Counterdefendant Rimini Street, Inc. and Counterdefendant
3 Seth Ravin (together, “Rimini”) and Counterclaimant Oracle America, Inc. and Defendant and
4 Counterclaimant Oracle International Corp. (together, “Oracle”; all parties collectively,
5 “Parties,” any party, “Party”) have agreed that the Stipulated Protective Order (Dkt. 58) should
6 be amended to add the following provisions to better effectuate the Parties’ proposed
7 technology-assisted review protocol, Dkt. 106, Ex. A (the “TAR Protocol”);

8 **WHEREAS**, the Parties have agreed that all paragraph references and defined terms
9 below refer to the paragraphs and definitions of the Stipulated Protective Order unless otherwise
10 stated;

11 **NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES**
12 **THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, AS FOLLOWS:**

13 24. All documents and other materials produced pursuant to the TAR Protocol or any
14 subsequent version thereof agreed to by the Parties (“TAR Documents”) shall be produced with a
15 metadata field that identifies them as TAR Documents.

16 25. All TAR Documents shall be designated and treated by all Parties as “Highly
17 Confidential Information – Attorneys’ Eyes Only” at the time of production.

18 26. Notwithstanding any provisions in Paragraph 16 to the contrary, any challenge to a
19 Designating Party’s confidentiality designation of any TAR Documents may be initiated either in
20 writing or via voice-to-voice dialogue. Any such challenge must identify the challenged
21 confidentiality designations by the Bates number(s) of the corresponding TAR Documents. The
22 Designating Party shall respond in writing to any such challenge within ten (10) days. If the Parties
23 are unable to resolve any dispute regarding a challenge to a Designating Party’s confidentiality
24 designation of TAR Documents, the Parties will submit their dispute(s) to the Court in the manner
25 approved by the Court for raising discovery disputes in this case. For the avoidance of doubt,
26 Paragraph 16 otherwise remains in full force and effect.

27 27. For the avoidance of doubt, the ten-day deadline set forth in Paragraph 26 will be
28 calculated pursuant to Federal Rule of Civil Procedure 6(a)(1). Federal Rule of Civil Procedure

1 6(d)'s three-day extension for documents served electronically does not apply to the ten-day
2 deadline.


3 28. The Parties may modify this procedure, including but not limited to the deadline set
4 forth in Paragraph 26, for any set of TAR Documents through written agreement without further
5 order of the Court.

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9 Dated: March 24, 2016

SHOOK, HARDY & BACON LLP	MORGAN, LEWIS & BOCKIUS LLP
By: /s/ Peter E. Strand	By: /s/ Thomas S. Hixson
Peter E. Strand Attorneys for Plaintiff and Counterdefendant Rimini Street, Inc. and Counterdefendant Seth Ravin	Thomas S. Hixson Attorneys for Counterclaimant Oracle America, Inc. and Defendant and Counterclaimant Oracle International Corp.

14
15 IS IT SO ORDERED:

16 DATED: _ March 25 __, 2016

17 By: 
United States Magistrate Judge

ATTESTATION OF FILER

The signatories to this document are Peter E. Strand and me, and I have obtained Mr. Strand's concurrence to file this document on his behalf.

Dated: March 24, 2016

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Thomas S. Hixson
Thomas S. Hixson
Attorneys for Counterclaimant Oracle
America, Inc. and Defendant and
Counterclaimant Oracle International Corp.

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