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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE AUTHORS GUILD, INC., *et al.*

Plaintiffs,

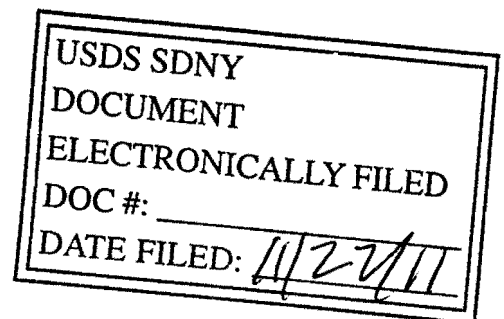
v.

HATHITRUST, *et al.*

Defendants.

11 CIV 6351 (HB)(JLC)

STIPULATION



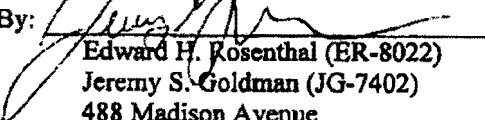
WHEREAS, all Plaintiffs and Defendants to the above-captioned action agree that in this litigation interrogatories are a more practical method of obtaining some information sought than depositions (and without restricting the parties' rights to take depositions, except as the Court may order); and

WHEREAS, Plaintiffs and Defendants further agree that, in light of the above, Plaintiffs (collectively) and Defendants (collectively) shall be entitled during discovery to serve up to as many as 30 interrogatories on the other;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, that notwithstanding the numerical limitations of Federal Rule of Civil Procedure 33(a)(1) and the subject matter limitations of Rule 33.3(a) of the Local Rules for the United States District Courts of the Southern and Eastern Districts of New York, Plaintiffs (collectively) and Defendants (collectively) may serve such interrogatories as the serving party deems appropriate, with neither Plaintiffs (collectively) nor Defendants (collectively) serving more than thirty (30) interrogatories on the other.

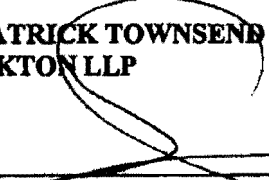
Dated: New York, New York
November 18, 2011

**FRANKFURT KURNIT KLEIN &
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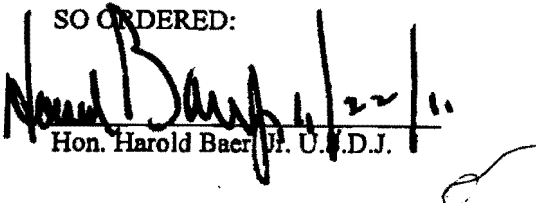
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SO ORDERED:


Hon. Harold Baer U.S.D.J.