on 5/2/2024 3:25 PM Reviewed By: Julie Mazon 20CV372366 Santa Clara – Civil

Case #20CV372366 Envelope: 15213876

Julie Mazon

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7	Attorneys for Defendant		
8	CISCO SYSTEMS, INC.		
9	Counsel for Plaintiff listed on next page		
10	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
11	COUNTY OF SANTA CLARA		
12			
13	CALIFORNIA CIVIL RIGHTS	Case No. 20CV372366	
14	DEPARTMENT, an agency of the State of California,	STIPULATION REGARDING CISCO'S MOTION TO COMPEL FURTHER	
15	Plaintiff,	RESPONSES TO THE SPECIAL INTERROGATORIES, SET ONE AND	
16	v.	REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE	
17	CISCO SYSTEMS, INC., a California Corporation;	Dept: 16	
18	Defendant.	Judge: Hon. Amber Rosen	
19		Complaint Filed: October 16, 2020	
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IT IS HEREBY STIPULATED by and between Plaintiff California Civil Rights

WHEREAS, Defendant filed motions to compel further responses to Plaintiff's answers to Form Interrogatories, Set One and Requests for Production of Documents, Set One, on December

WHEREAS, the Court did not rule on Defendant's motions, but rather, Ordered the Parties to meet and confer to narrow the issues in advance of an Informal Discovery Conference on April

WHEREAS, the parties met and conferred, narrowed the issues, and submitted three issues

WHEREAS, the Court, having considered the arguments of the parties and Plaintiff's

WHEREAS, at the Informal Discovery Conference, the Court directed the parties to stipulate to the Court's rulings made during the conference in lieu of a formal order from the Court;

Accordingly, the Parties agree that the Court made the following rulings at the

- That Defendant's Motion to Compel further responses to Request for Production of Documents, Set One, Request No. 54 is GRANTED. Plaintiff must produce the documents it is relying upon. Plaintiff must provide a privilege log if it is withholding documents under privilege. Plaintiff may limit its response to documents it is relying upon in this case. Plaintiff must amend its response to this request within 35 days of the
- That Defendant's Motion to Compel further response to Request for Production of

1	Documents, Set One, Request No. 70 is DENIED.		
2	That Defendant's request for monetary sanctions is GRANTED IN PART. Ove		
3	Plaintiff's objections, the Court awarded \$2,000 in sanctions. <sup>1</sup>		
4	IT IS SO STIPULATED.		
5			
6	Dated: May 2, 2024	Orrick, Herrington & Sutcliffe LLP	
7			
8		By: _/s/ Nicholas Horton	
9		NICHOLAS J. HORTON Attorneys for Defendant	
10		CISCO ŠYSTEMS, INC.	
11	Dated: May 2, 2024	California Civil Rights Department	
12			
13		By: <u>/s/ Rumduol Vuong</u> RUMDUOL VUONG	
14		Attorneys for Plaintiff	
15		CALIFORNÍA CIVIL RIGHTS DEPARTMENT	
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17			
18	[PROPOSED] ORDER		
19	Pursuant to the Stipulation of the Partie	es above, IT IS SO ORDERED.	
20	•		
21	<b>5/3/2024 1:56:08 PM</b> Dated:	Anh n	
22		The Honorable Amber Rosen	
23		Judge of the Superior Court	
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27		ts and objects to the order to stipulate to an award of	
28	<sup>1</sup> Plaintiff respectfully reserves its rights and objects to the order to stipulate to an award of sanctions against CRD.		
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1	PROOF OF SERVICE			
2	I am a citizen of the United States, more than eighteen years old and not a party to this			
3	action. My business address is Orrick, Herrington & Sutcliffe LLP, The Orrick Building, 405			
4	Howard Street, San Francisco, CA 94105. On May 2, 2024, I served the following documents:			
5	STIPULATION REGARDING CISCO'S MOTION TO COMPEL FURTHER RESPONSES TO THE SPECIAL INTERROGATORIES, SET ONE AND REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE			
7	By Electronic Service: On all of the interested parties in this action by transmitting true and			
8	correct copies of the documents identified above in portable document format from the email			
9	address kvasquez@orrick.com to the email addresses below:			
10	Rumduol Vuong			
11	rumduol.vuong@calcivilrights.ca.gov Jamie Crook			
12	Jamie.crook@calcivilrights.ca.gov Dylan Colbert			
13	Dylan.colbert@calcivilrights.ca.gov Brett Watson			
14	Brett.watson@calcivilrights.ca.gov Eliana Mata			
15	I declare under penalty of perjury that the foregoing is true and correct. Executed on Ma			
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19	Karen Vasquez			
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