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Filed
May 15, 2024
Clerk of the Court
Superior Court of CA
County of Santa Clara
20CV372366
By: zpetrova

7 Attorneys for Defendant
CISCO SYSTEMS, INC.

8
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
DEPARTMENT, an agency of the State of
14 California,

15 Plaintiff,

16 v.

17 CISCO SYSTEMS, INC., a California
Corporation,;

18 Defendant.
19
20

Case No. 20CV372366

**STIPULATION REGARDING CISCO'S
MOTION TO COMPEL FURTHER
RESPONSES TO THE SPECIAL
INTERROGATORIES, SET ONE AND
REQUEST FOR PRODUCTION OF
DOCUMENTS, SET ONE**

Dept: 16
Judge: Hon. Amber Rosen

Complaint Filed: October 16, 2020

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Attorneys for Plaintiff,
CALIFORNIA CIVIL RIGHTS DEPARTMENT

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Documents, Set One, Request No. 70 is DENIED.

- That Defendant’s request for monetary sanctions is GRANTED IN PART. Over Plaintiff’s objections, the Court awarded \$2,000 in sanctions.¹

IT IS SO STIPULATED.

Dated: May 2, 2024

Orrick, Herrington & Sutcliffe LLP

By: /s/ Nicholas Horton

NICHOLAS J. HORTON
Attorneys for Defendant
CISCO SYSTEMS, INC.

Dated: May 2, 2024

California Civil Rights Department

By: /s/ Rumduol Vuong

RUMDUOL VUONG
Attorneys for Plaintiff
CALIFORNIA CIVIL RIGHTS
DEPARTMENT

~~PROPOSED~~ ORDER

Pursuant to the Stipulation of the Parties above, **IT IS SO ORDERED.**

5/3/2024 1:56:08 PM
Dated: _____



The Honorable Amber Rosen
Judge of the Superior Court

¹ Plaintiff respectfully reserves its rights and objects to the order to stipulate to an award of sanctions against CRD.

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PROOF OF SERVICE

I am a citizen of the United States, more than eighteen years old and not a party to this action. My business address is Orrick, Herrington & Sutcliffe LLP, The Orrick Building, 405 Howard Street, San Francisco, CA 94105. On May 2, 2024, I served the following documents:

STIPULATION REGARDING CISCO’S MOTION TO COMPEL FURTHER RESPONSES TO THE SPECIAL INTERROGATORIES, SET ONE AND REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE

By Electronic Service: On all of the interested parties in this action by transmitting true and correct copies of the documents identified above in portable document format from the email address kvasquez@orrick.com to the email addresses below:

- Rumduol Vuong
rumduol.vuong@calcivilrights.ca.gov
- Jamie Crook
Jamie.crook@calcivilrights.ca.gov
- Dylan Colbert
Dylan.colbert@calcivilrights.ca.gov
- Brett Watson
Brett.watson@calcivilrights.ca.gov
- Eliana Mata
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I declare under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2024 in San Rafael, California.



Karen Vasquez