

Jahan C. Sagafi (Cal. Bar No. 224887)
Cristina Schrum-Herrera (Cal. Bar No. 315319)
OUTTEN & GOLDEN LLP
One Embarcadero Center, 38th Floor
San Francisco, CA 94111
Telephone: (415) 638-8800
Facsimile: (415) 638-8810
E-mail: jsagafi@outtengolden.com

Michael P. Esser (Cal. Bar No. 268634)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
E-mail: michael.esser@kirkland.com

Daniel Kohrman (admitted *pro hac vice*)
Laurie McCann (admitted *pro hac vice*)
Dara Smith (admitted *pro hac vice*)
AARP FOUNDATION LITIGATION
601 E. Street, N.W.
Washington, D.C. 20049
Telephone: (202) 434-2060
Facsimile: (202) 434-2082
E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
E-mail: dsmith@aarp.org

Emily Nicklin (admitted *pro hac vice*)
Gabor Balassa (admitted *pro hac vice*)
Christina Briesacher (admitted *pro hac vice*)
Mark Premo-Hopkins (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
300 N. LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
E-mail: emily.nicklin@kirkland.com
E-mail: gabor.balassa@kirkland.com
E-mail: christina.briesacher@kirkland.com
E-mail: mark.premohopkins@kirkland.com

*Attorneys for Plaintiffs and Proposed Class
and Collective Members*

*Attorneys for Defendant
PricewaterhouseCoopers LLP*

Additional counsel listed on the next page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

STEVE RABIN and JOHN CHAPMAN,
on behalf of themselves, and all others
similarly situated,

Plaintiffs,

v.

PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 16-cv-02276-JST

**STIPULATION AND [PROPOSED] ORDER
RE JOINT LETTER BRIEF ON ESI SEARCH
PROCESS**

Hon. Judge Jon S. Tigar

1 Adam T. Klein (admitted *pro hac vice*)
2 Melissa L. Stewart (admitted *pro hac vice*)
3 Daniel Stromberg (admitted *pro hac vice*)
4 OUTTEN & GOLDEN LLP
5 685 Third Avenue, 25th Floor
6 New York, NY 10017
7 Telephone: (212) 245-1000
8 Facsimile: (646) 509-2060
9 E-mail: atk@outtengolden.com
10 E-mail: mstewart@outtengolden.com
11 E-mail: dstromberg@outtengolden.com

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28 Jennifer L. Liu (Cal. Bar No. 279370)
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, CA 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

1 Plaintiffs Steve Rabin and John Chapman (“Plaintiffs”) and Defendant
2 PricewaterhouseCoopers LLP (“PwC”) (collectively, “the Parties”) hereby stipulate and agree as
3 follows:

4 WHEREAS, on July 13, 2017, Plaintiffs and PwC participated in a telephonic hearing with
5 the Court regarding ongoing discovery disputes;

6 WHEREAS, the Court’s Minute Order, ECF No. 134, instructed the Parties to submit a joint
7 letter brief by July 26, 2017, concerning the Parties’ dispute over Plaintiffs’ request for production
8 of ESI from PwC;

9 WHEREAS, the Parties have engaged in extensive negotiation over the course of
10 approximately five months to narrow the scope of their remaining ESI dispute;

11 WHEREAS, the Parties’ remaining ESI dispute involves complex issues related to
12 technology-assisted review (TAR) and ESI best practices;

13 WHEREAS, the Parties have already begun to exchange text;

14 WHEREAS, because of the technical complexity of the ESI issues involved and the
15 approaches to be proposed, the Parties request that the page limit be extended to a total of eight
16 pages, with each side allowed at most four pages.

17 THEREFORE, IT IS HEREBY STIPULATED that the page limit is extended to eight
18 pages, with at most four pages allocated per Party.

19 Dated: July 24, 2017

Respectfully submitted,

20 By: /s/ Jahan C. Sagafi
21 Jahan C. Sagafi

22 Jahan C. Sagafi (Cal. Bar No. 224887)
23 Cristina Schrum-Herrera (Cal. Bar No. 315319)
24 OUTTEN & GOLDEN LLP
25 One Embarcadero Center, 38th Floor
26 San Francisco, CA 94111
27 Telephone: (415) 638-8800
28 Facsimile: (415) 638-8810
E-mail: jsagafi@outtengolden.com

1 Adam T. Klein (admitted *pro hac vice*)
2 Melissa L. Stewart (admitted *pro hac vice*)
3 Daniel Stromberg (admitted *pro hac vice*)
4 OUTTEN & GOLDEN LLP
5 685 Third Avenue, 25th Floor
6 New York, NY 10017
7 Telephone: (212) 245-1000
8 Facsimile: (646) 509-2060
9 E-mail: atk@outtengolden.com
10 E-mail: mstewart@outtengolden.com
11 E-mail: dstromberg@outtengolden.com

8 Daniel Kohrman (admitted *pro hac vice*)
9 Laurie McCann (admitted *pro hac vice*)
10 Dara Smith (admitted *pro hac vice*)
11 AARP FOUNDATION LITIGATION
12 601 E. Street, N.W.
13 Washington, D.C. 20049
14 Telephone: (202) 434-2060
15 Facsimile: (202) 434-2082
16 E-mail: dkohrman@aarp.org
17 E-mail: lmccann@aarp.org
18 E-mail: dsmith@aarp.org

15 Jennifer L. Liu (Cal. Bar No. 279370)
16 THE LIU LAW FIRM, P.C.
17 1170 Market Street, Suite 700
18 San Francisco, CA 94102
19 Telephone: (415) 896-4260
20 Facsimile: (415) 231-0011
21 E-mail: jliu@liulawpc.com

20 *Counsel for Plaintiffs and Proposed Class and*
21 *Collective Members*

1 Dated: July 24, 2017

By: /s/ Gabor Balassa
Gabor Balassa

2 Emily Nicklin (*pro hac vice*)
3 Gabor Balassa (*pro hac vice*)
4 Christina Briesacher (*pro hac vice*)
5 Mark Premo-Hopkins (*pro hac vice*)
6 KIRKLAND & ELLIS LLP
7 300 North LaSalle
8 Chicago, IL 60654
9 Telephone: (312) 862-2000
10 Facsimile: (312) 862-2200
11 E-mail: emily.nicklin@kirkland.com
12 E-mail: gabor.balassa@kirkland.com
13 E-mail: christina.briesacher@kirkland.com
14 E-mail: mark.premohopkins@kirkland.com

15 Michael P. Esser (Cal. Bar No. 268634)
16 KIRKLAND & ELLIS LLP
17 555 California Street
18 San Francisco, CA 94104
19 Telephone: (415) 439-1400
20 Facsimile: (415) 439-1500
21 E-mail: michael.esser@kirkland.com

22 *Attorneys for Defendant*
23 *PricewaterhouseCoopers LLP*
24
25
26
27
28

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Date: _____

Honorable Jon S. Tigar
United States District Judge