		ATES DISTRICT						
1 2 3 4 5 6 7	I. NEEL CHATTERJEE (STATE BAR NO. 17: nchatterjee@orrick.com MONTE M.F. COOPER (STATE BAR NO. 19) mcooper@orrick.com THERESA A. SUTTON (STATE BAR NO. 21 tsutton@orrick.com MORVARID METANAT (STATE BAR NO. 2 mmetanat@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025 Telephone: 650-614-7400 Facsimile: 650-614-7401	6746) 1857) 68228) Z Judge James Ware						
8 9	Attorneys for Plaintiff FACEBOOK, INC.							
10	UNITED STATES DISTRICT COURT							
11	NORTHERN DISTRICT OF CALIFORNIA							
12	SAN FRANCISCO DIVISION							
13	FACEBOOK, INC.,	Case No. 5:08-cv-05780 JW						
14	Plaintiff,	JOINT STIPULATION PURSUANT						
15	V.	TO THE COURT'S AUGUST 18, 2011 ORDER GRANTING PLAINTIFF'S						
16 17 18	POWER VENTURES, INC. a Cayman Island Corporation; STEVE VACHANI, an individual; DOE 1, d/b/a POWER.COM, DOES 2-25, inclusive,	MOTION TO COMPELJudge:Hon. James WareCourtroom:15, 18th Floor						
19	Defendants.							
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		JOINT STIPULATION PURSUANT TO COURT'S AUGUST 18, 2011 ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL 5:08-CV-05780 JW						

1 Pursuant to the Court's August 8, 2011 Order Granting Plaintiff's Motion to Compel (Dkt. 2 No. 127), Plaintiff Facebook, Inc. ("Facebook") and Defendants Power Ventures, Inc. ("Power") 3 and Steven Vachani (collectively "Defendants"), by and through their respective counsel of 4 record, hereby stipulate to the following with regards to how Defendants' source code shall be 5 produced and reviewed: 6 1. Facebook's review of Defendants' source code will commence on and after 7 August 23, 2011 at the Office of Bursor & Fisher, P.A., located at 2121 North California Blvd., 8 Suite 1010, Walnut Creek, CA 94596. 9 2. Pursuant to the Section 8 of the Parties' February 4, 2011 Stipulated Protective 10 Order, Defendants' source code shall be made available for inspection on a secured computer in a 11 secured room without Internet access or network access to other computers. The secured 12 computer shall have all external data access ports disabled, including, but not limited to, external 13

- media drives, USB slots, and/or peripheral slots. This review will be conducted by one or more consultants and/or experts from Zeidman Consulting, as Facebook disclosed to Defendants on July 14, 2011 pursuant to Section 7.4(a) of the Stipulated Protective Order.
- 3. In conjunction with Section 8 of the Parties' Protective Order, Facebook's experts shall be permitted to install onto the secured computer, software by the name of "Understand" to facilitate the review of Defendants' source code.
- 4. Pursuant to Section 8(e) of the Parties' Protective Order, the Parties shall maintain an inspection log of any individual who has inspected any portion of the source code in electronic or paper form. Attached hereto as **Exhibit A** is a true and correct copy of the inspection log to be maintained by the Parties.

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1	IT IS SO STIPULATED.					
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3	Dated: August 31, 2011	ORRICK, HERRINGTON & SUTCLIFFE LLP				
4						
5		/s/ Morvarid Metanat /s/ MORVARID METANAT				
6		Attorneys for Plaintiff FACEBOOK, INC.				
7						
8	Dated: August 31, 2011	BURSOR & FISHER, P.A.				
9						
10		/s/ L. Timothy Fisher /s/				
11		L. TIMOTHY FISHER Attorneys for Defendants				
12		POWER VENTURES, INC. AND STEVE VACHANI				
13	Filon's Attestation. Dursuant to Ca	noral Order No. 45, 8V(P). Lattact under populity of				
14	Filer's Attestation: Pursuant to General Order No. 45, §X(B), I attest under penalty of perjury that concurrence in the filing of the document has been obtained from its signatory.					
15	perjury that concurrence in the thing of the	document has been obtained from its signatory.				
16	Dated: August 31, 2011	Respectfully submitted,				
17	Dated. August 51, 2011					
18		/s/ Morvarid Metanat /s/ MORVARID METANAT				
19						
20	IT IS SO ORDERED:					
21						
22	Dated: September 6, 2011	Honorable James Ware				
23		United States District Chief Judge				
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28		JOINT STIPULATION PURSUANT TO COURT'S AUGUST 18,				
		- 2 - 2011 Order Granting Plaintiff's Motion to Compel 5:08-cv-05780 JW				

EXHIBIT A

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Facebook v. Power et al. Power Source Code Inspection Log

NAME	COMPANY	DATE	BEGIN	END	E-FILES TO	PRODUCTION RANGE
			INSPECTION	INSPECTION	PRINT	