

October 27, 2014

**VIA ECF**

The Honorable Edward M. Chen, U.S.D.J.  
Courtroom 5, Seventeenth Floor  
United States District Court  
for the Northern District of California  
450 Golden Gate Avenue  
San Francisco, California 94102

**Re: *In re MyFord Touch Consumer Litigation*, No. 3:13-cv-3072-EMC (N.D. Cal.)**

Dear Judge Chen:

Pursuant to Your Honor's October 20, 2014 Case Management and Pretrial Order for Jury Trial (Dkt. No. 118), this joint letter serves as an update regarding the efforts made by all Parties to resolve the remaining open items pertaining to the draft Stipulation For Protective Order For Litigation Involving Highly Sensitive Information, Trade Secrets, Computer Software, Source Code And Related Intellectual Property ("Source Code Protective Order").

**Joint Position**

The Parties have made significant progress over the past ten days. After several fruitful meet-and-confer opportunities, we can report that we have successfully resolved all substantive issues regarding the Source Code Protective Order. We are currently updating the current draft of the Source Code Protective Order to reflect these recent agreements and to provide further clarification on selected minor logistical issues. We therefore anticipate that we will file the Parties proposed Stipulated Source Code Protective Order for the Court's review on Friday, October 31, 2014.

Respectfully,

/s/Steve W. Berman

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