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MARIN COUNTY  
SUPERIOR COURT

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 11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 12 **FOR THE COUNTY OF MARIN**

14 PAYWARD, INC., d/b/a Kraken, a California  
 15 corporation,

16 Plaintiff,

17 v.

18 DOES 1 through 10, inclusive,

19 Defendants.

) Case No.: CIV 1902105

) **STIPULATION AND [PROPOSED]**  
 ) **ORDER TO STAY PRODUCTION BY**  
 ) **NON-PARTY GLASSDOOR, INC.**

) Action Filed: May 30, 2019

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 25 **FAXED**  
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1 **STIPULATION**

2 Plaintiff Payward, Inc., d/b/a Kraken (“Payward”), Movant J. Doe (“Doe”), and non-party  
3 Glassdoor, Inc. (“Glassdoor”), by and through their respective counsel of record, hereby enter into  
4 the stipulation below with reference to the following facts:

5 1. WHEREAS on November 22, 2019, the Court entered an Order granting in part and  
6 denying in part Payward’s Motion to Compel Glassdoor to produce documents in response to  
7 Payward’s June 21, 2019 deposition subpoena seeking responsive information regarding certain  
8 Glassdoor users who posted reviews about Payward;

9 2. WHEREAS the Court’s Order required Glassdoor to notify affected users whose  
10 identifying information it would have to turn over to Payward and provided that Glassdoor must  
11 provide said information to Payward within sixty (60) days of giving notice;

12 3. WHEREAS on December 16, 2019, Glassdoor provided notice to affected users,  
13 requiring Glassdoor to turn over identifying information of its affected users by February 14, 2020;

14 4. WHEREAS on February 10, 2020, affected user J. Doe (“Doe”) filed a Motion to  
15 Quash (“Motion”) the subpoena; and


16 5. WHEREAS Payward, Doe, and Glassdoor consent to a stay of Glassdoor’s  
17 production with respect to any identifying information regarding Doe, and only Doe, during the  
18 Court’s resolution of Doe’s Motion.

19 THEREFORE Payward, Doe, and Glassdoor, by and through their undersigned counsel,  
20 hereby stipulate and request that the Court order that:

21 The deadline for Glassdoor to turn over identifying information regarding Doe, and only  
22 Doe, is stayed during the pendency of Doe’s Motion and resolution by the Court.

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24 IT IS SO STIPULATED

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27 Dated: February 10, 2020

  
\_\_\_\_\_  
Aaron Mackey  
Attorney for Non-Party J. Doe

1 Dated: February 10, 2020

*Andrew Calderon*

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Andrew Calderon  
*Attorney for Plaintiff Payward*

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5 Dated: February \_\_\_\_\_, 2020

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William J. Frimel  
*Attorney for Non-Party Glassdoor*

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9 **IT IS SO ORDERED.**

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11 Dated: \_\_\_\_\_, 2020

\_\_\_\_\_  
Hon. James T. Chou  
Judge of the Superior Court

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1 Dated: February \_\_\_\_, 2020

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Andrew Calderon  
*Attorney for Plaintiff Payward*

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5 Dated: February 10, 2020

  
\_\_\_\_\_  
William J. Frimel  
*Attorney for Non-Party Glassdoor*

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9 **IT IS SO ORDERED.**

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11 Dated: \_\_\_\_\_, 2020

\_\_\_\_\_  
Hon. James T. Chou  
Judge of the Superior Court

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