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*Attorneys for Defendant AGIS Software  
Development LLC*

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

LYFT, INC.  
  
Plaintiff,  
  
v.  
  
AGIS SOFTWARE DEVELOPMENT LLC,  
  
Defendant.

Case No. 5:21-cv-04653-BLF (SVK)  
  
**JOINT STATEMENT REGARDING  
PARTIALLY DISPUTED [PROPOSED]  
PROTECTIVE ORDER**

Date: April 29, 2022  
Time: 10:00 AM  
Magistrate Judge: Susan van Keulen  
  
Judge: Hon. Beth Labson Freeman  
Trial Date: October 16, 2023  
Courtroom: 3, Fifth Floor

1 Plaintiff Lyft, Inc. (“Lyft”) and Defendant AGIS Software Development LLC (“AGIS”)  
 2 (collectively, the “Parties”) submit this Joint Statement Regarding Partially Disputed Proposed  
 3 Protective Order.

4 Pursuant to Dkt. 112, the Parties met and conferred on April 26 and April 28, 2022 to narrow  
 5 their disputes regarding a protective order governing the confidentiality and disclosure of discovery  
 6 for the above-captioned case. The Parties submit herewith as Exhibit A their Partially Disputed  
 7 Proposed Protective Order, and submit, as Exhibit B, a redline version over the model protective  
 8 order in conformance with the standing order identified in Dkt. 112. The Parties have indicated  
 9 their competing proposals using highlighting and square brackets in Exhibit A (the Parties’  
 10 respective proposals are indicated with Plaintiff’s Proposal and Defendants’ Proposal). The Parties  
 11 were able to reach agreement on almost all provisions of the Protective Order, but have two disputes  
 12 regarding (1) whether the Protective Order should permit a Receiving Party’s code reviewer to  
 13 transfer their electronic notes from the agreed electronic notetaking computer to a removable  
 14 recordable medium, and (2) the number of pages and conditions under which the Producing Party  
 15 must provide source code printouts to the Receiving Party.

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 18 Dated: April 28, 2022

Respectfully submitted,

19 /s/ Vincent J. Rubino, III

/s/ Jeremy J. Taylor

Jeremy J. Taylor

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**FILER'S ATTESTATION**

I, Jeremy J. Taylor, am the ECF user whose ID and password are being used to file this Joint Statement. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing.

Dated: April 28, 2022

/s/ Jeremy J. Taylor  
Jeremy J. Taylor