

1 SEAN REIS (#184044) (sreis@edelson.com)
EDELSON MCGUIRE, LLP
2 30021 Tomas Street, Suite 300
3 Rancho Santa Margarita, California 92688
Tel: (949) 459-2124
4 Fax: (949) 459-2123

5 JAY EDELSON (jedelson@edelson.com)
RAFEY S. BALABANIAN (rbalabanian@edelson.com)
6 WILLIAM C. GRAY (wgray@edelson.com)
7 ARI J. SCHARG (ascharg@edelson.com)
EDELSON MCGUIRE, LLC
8 350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
9 Tel: (312) 589-6370
Fax: (312) 589-6378
10

11 *Attorneys for Plaintiffs and the Putative Class*

12 KEITH E. EGGLETON (#159842) (keggleton@wsgr.com)
RODNEY G. STRICKLAND (#161934) (rstrickland@wsgr.com)
13 DALE BISH (#235390) (dbish@wsgr.com)
Wilson Sonsini Goodrich & Rosati
14 650 Page Mill Road
Palo Alto, California 94304
15 Tel: (650) 493-9300
Fax: (650) 493-6811
16

17 *Attorneys for Defendant Netflix, Inc.*

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**

20
21
22 IN RE: NETFLIX PRIVACY LITIGATION
23
24

Case No. 5:11-cv-00379-EJD

STIPULATION AND [~~PROPOSED~~] ORDER
REGARDING ALTERNATIVE DISPUTE
RESOLUTION

1 WHEREAS, pursuant to the Court's ADR Notice dated October 14, 2011, counsel for
2 plaintiffs and Netflix, Inc. ("Netflix") held telephonic conferences with the Court's ADR staff
3 attorney on October 27 and November 29, 2011;

4 WHEREAS, the parties have agreed to participate in a private mediation with a
5 professional mediator to be mutually agreed upon by the parties; and

6 WHEREAS, subject to the availability of the private mediator they select, the parties
7 anticipate conducting the mediation in or before February 2012; and

8 WHEREAS, the parties wish to have until April 30, 2012 to complete the mediation;

9 NOW THEREFORE, IT IS HEREBY STIPULATED that the parties shall conduct a
10 private mediation before a mutually agreeable mediator prior to April 30, 2012.

11
12 Dated: December 1, 2011

s/ Rodney G. Strickland, Jr.

13 Rodney G. Strickland, Jr.
14 WILSON SONSINI GOODRICH &
15 ROSATI

16 Attorneys for Defendant
17 NETFLIX, INC.

18
19 Dated: December 1, 2011

s/ Sean Reis

20 Sean Reis
21 EDELSON McGUIRE LLP

22 Attorneys for Plaintiff Jeff Milans
23
24
25
26
27
28

1 ~~PROPOSED~~ ORDER

2 The parties shall conduct a private mediation before a mutually agreeable mediator prior
3 to April 30, 2012.

4 PURSUANT TO STIPULATION, IT IS SO ORDERED.

5 Dated: December 1, 2011

6 
UNITED STATES DISTRICT JUDGE

1 **ECF CERTIFICATION**

2 I, Rodney G. Strickland, Jr., am the ECF User whose identification and password are
3 being used to file this Stipulation and [Proposed] Order Regarding Alternative Dispute
4 Resolution. I hereby attest that Sean Reis has concurred in this filing.
5

6 Dated: December 1, 2011

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

7
8 By: /s/ Rodney G. Strickland, Jr.
9 Rodney G. Strickland, Jr.

10 Attorneys for Defendant
11 NETFLIX, INC.
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28