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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

ORACLE CORPORATION, et al., Plaintiffs, v. SAP AG, et al., Defendants.	Case No. 07-CV-1658 PJH (EDL) **STIPULATED REQUEST AND [PROPOSED] ORDER SHORTENING TIME TO HEAR DEFENDANTS' MOTION TO STAY OR TO EXTEND TIME TO COMPLY WITH JULY 3, 2008 DISCOVERY ORDER**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Oracle Corporation, Oracle USA, Inc., and Oracle International Corporation ("Oracle") and Defendants SAP AG, SAP America, Inc. and TomorrowNow, Inc. ("Defendants") hereby submit this stipulated request to shorten time to hear Defendants' Motion to Stay or to Extend Time to Comply with the Court's July 3, 2008 Discovery Order ("Defendants' Motion").

Defendants' Motion is being filed concurrently with this Stipulated Request. The motion seeks a stay of, or an extension of time to comply with, the Court's July 3, 2008 Order to produce documents provided to the grand jury, pending appeal of that Order to Judge Hamilton. Specifically, the motion seeks a stay of or an extension from the current compliance date of July 23, 2008 until a date seven (7) days after the disposition by Judge Hamilton of Defendants' appeal.

Oracle plans to oppose Defendants' Motion. Under Civil Local Rule 6-3(c), Oracle has until July 23rd to file its opposition. However, Oracle has agreed to file its opposition two (2) days early, on July 21, and Defendants have agreed not to file a reply brief so that the Court may rule on Defendants' Motion on or before the current compliance date of July 23. The reasons for this requested shortening of time are set forth in the accompanying Declaration of Jason McDonell.

DATED: July 18, 2008

JONES DAY

By: /s/ Jason McDonell
Jason McDonell

Attorneys for Defendants
SAP AG, SAP AMERICA, INC., and
TOMORROWNOW, INC.

In accordance with General Order No. 45, Rule X, the above signatory attests that concurrence in the filing of this document has been obtained from the signatory below.

DATED: July 18, 2008

BINGHAM McCUTCHEN LLP

By: /s/ Geoffrey M. Howard
Geoffrey M. Howard

Attorneys for Plaintiffs
Oracle Corporation, Oracle International Corporation, and Oracle USA, Inc.

PURSUANT TO STIPULATION , IT IS SO ORDERED.

Dated: _____

ELIZABETH D. LAPORTE
United States Magistrate Judge