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17 SUPERIOR COURT OF THE STATE OF CALIFORNIA
18 COUNTY OF SAN FRANCISCO

19 THE PEOPLE OF THE STATE OF
CALIFORNIA,

20 Plaintiff,

21 v.

22 AMAZON.COM, INC.,

23 Defendant.
24

No. CGC-22-601826

**STIPULATED ELECTRONICALLY
STORED INFORMATION PROTOCOL
AND [~~PROPOSED~~] ORDER**

Dep't: 304

Judge: Hon. Ethan P. Schulman

Case Filed: September 15, 2022

1 The Parties have agreed and stipulated to certain issues regarding expert discovery in the above-
2 referenced action (“Action”), and thus submit this Stipulated Electronically Stored Information Protocol
3 and Proposed Order (“ESI Stipulation”), subject to approval by the Court.

4 **I. SPECIFICATIONS FOR PRODUCTION OF DOCUMENTS**

5 1. The above-captioned parties, and parties receiving non-party subpoenas, shall abide by
6 the following provisions regarding the discovery of electronically stored information (“ESI”) in the
7 matter described in this order. Nothing in this ESI Protocol shall be interpreted in a manner inconsistent
8 with any protective order, expert stipulation, or case management order entered in this case.

9 2. The proportionality standard set forth in Cal. Civ. Proc. Code § 2017.010 must be applied
10 in each case when formulating a discovery plan. To further the application of the proportionality
11 standard in discovery, requests for production of ESI and related responses should be reasonably
12 targeted, clear, and as specific as possible.

13 3. A party that issues a non-party subpoena shall include a copy of this order with the
14 subpoena. The issuing party shall be responsible for producing any documents obtained under a
15 subpoena to all other parties. If the non-party production is not Bates-stamped, the issuing party shall
16 promptly endorse the non-party production with unique prefixes and Bates numbers prior to producing
17 them to all other parties.

18 4. For the avoidance of doubt, this Stipulation does not apply to any documents or data
19 produced during the investigation conducted by the California Attorney General that may be reproduced
20 in the litigation. Any documents or data previously produced in the investigation may be reproduced in
21 the same format as it was produced during the investigation.

22 **II. PRODUCTION OF ELECTRONICALLY STORED INFORMATION (ESI)**

23 5. **Load files.** Except where noted below, all ESI is to be produced in electronic format,
24 with files suitable for loading into a Concordance compatible litigation support review database. All
25 productions will include both image and metadata load files, as described in Appendix A: Load File
26 Format.

27 6. **Metadata Fields and Processing.** Each of the metadata and coding fields set forth in
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1 Appendix B that can be extracted from a document shall be produced for that document. The parties are
2 not obligated to populate manually any of the fields in Appendix B if such fields cannot be
3 automatically extracted from a document.

4 7. **System Files.** Common system and program files need not be processed, reviewed or
5 produced. The producing party shall keep an inventory of the system files not being produced and the
6 criteria (e.g., non-human readable file, etc.) for not processing the files.

7 8. **Email.** Whenever possible, email shall be collected from the producing party's email
8 store or server (e.g., MS Exchange, Lotus Notes) because this is the most reliable source from which to
9 produce and maintain email metadata and structure. Metadata and "header fields" shall be extracted
10 from email messages. Email messages, meeting notices, calendar items, contacts and tasks shall all be
11 extracted from the email archives.

12 9. **De-Duplication.** Removal of duplicate documents shall only be done on exact duplicate
13 documents (based on MD5, SHA-1, or Relativity processing duplicate hash values at the document
14 level), at the family level, across all custodians (global), and the Custodian field will list each Custodian,
15 separated by a semicolon, who was a source of that document prior to deduplication. If a party is unable
16 to provide such information within the Custodian field, or if global deduplication could otherwise limit
17 the ability to provide that a particular document was possessed by a custodian, then removal of duplicate
18 documents shall only be done on exact duplicate documents (based on MD5 or SHA-1 hash values at the
19 document level) within a source (custodian).

20 10. **TIFFs/JPGs.** Single-page Group IV TIFF images shall be provided using at least 300
21 DPI print setting. Each image shall have a unique file name, which is the Bates number of the document.
22 Original document orientation shall be maintained (i.e., portrait to portrait and landscape to landscape).
23 TIFFs will show any and all text and images which would be visible to the reader using the native
24 software that created the document. Documents containing color need not be produced initially in color.
25 However, if an original document contains color necessary to understand the meaning or content of the
26 document, the producing party will honor reasonable requests for a color image of the document. If
27 color images are to be produced, they will be provided in JPG format.

1 11. **Embedded Objects.** Objects embedded in Microsoft Word and .RTF documents, which
2 have been embedded with the “Display as Icon” feature, will be extracted as separate documents and
3 treated like attachments to the document. Other objects embedded in documents shall be produced as
4 native files unless the embedded file is non-substantive (e.g. email signature, social media icons) or the
5 embedded file is an image (e.g., .jpg file) that is already visible and legible in the imaged file. For the
6 avoidance of doubt, where the embedded object is a Microsoft Excel, PowerPoint, or Word file, or an
7 email file, it will be extracted as a separate file.

8 12. **Compressed files.** Compression file types (e.g., .CAB, .GZ, .TAR, .Z, .ZIP) shall be
9 decompressed in a reiterative manner to ensure that a zip within a zip is decompressed into the lowest
10 possible compression resulting in individual folders and/or files.

11 13. **Text Files.** For each document, a single text file shall be provided along with the image
12 files and metadata. The text file name shall be the same as the page Bates number of the first page of the
13 document. File names shall not have any special characters or embedded spaces. Electronic text must be
14 extracted directly from the native electronic file unless the document was redacted, is an image file, or is
15 a physical file. In these instances, a text file created using OCR will be produced in lieu of extracted
16 text. See below for OCR requirements.

17 14. **Spreadsheets.** Various types of files, including but not limited to MS Excel spreadsheets,
18 media files, etc., may lose significant information and meaning when produced as an image and
19 therefore should be produced as native files as instructed below.

- 20 a. Any native files that are produced shall be produced with a Bates-numbered TIFF image
21 slip-sheet stating the document has been produced in native format. Any native files that
22 are produced shall be produced with the Source File Path provided, as well as all
23 extracted text and applicable metadata fields set forth in Appendix B.
- 24 b. Spreadsheets. Excel spreadsheets shall be produced as a native document file along with
25 the extracted text and relevant metadata identified in Appendix B for the entire
26 spreadsheet, plus a Bates-numbered TIFF image slip-sheet stating the document has been
27 produced in native format.

1 15. **Presentations.** PowerPoint presentations shall be produced as a native document file
2 along with the extracted text and relevant metadata identified in Appendix B for the entire presentation,
3 plus a Bates-numbered TIFF image slip-sheet stating the document has been produced in native format.

4 16. **Other ESI that is Impractical to Produce in Traditional Formats.** The parties
5 understand and acknowledge that certain categories of ESI are structurally complex and do not lend
6 themselves to production in native format or other traditional formats. To the extent a response to
7 discovery requires production of discoverable electronic information contained in a database, the
8 producing party shall consider methods of production that best provide all relevant information,
9 including but not limited to duplication of databases or limited access for the purpose of generating
10 reports. Parties should consider whether all relevant information may be provided by querying the
11 database for discoverable information and generating a report in a reasonably usable and exportable
12 electronic file (e.g., Excel, CSV or SQL format). The parties agree to confer to obtain an appropriate
13 resolution to such requests.

14 17. **Endorsements.** The producing party will brand all TIFF images in the lower right-hand
15 corner with its corresponding Bates number, using a consistent font type and size. The Bates number
16 must not obscure any part of the underlying data. The producing party will brand all TIFF images in the
17 lower left-hand corner with all confidentiality designations agreed to by the parties, consistent with the
18 Protective Order entered in the case.

19 18. **Redactions.** If a file that originates in ESI needs to be redacted before production, the file
20 will be rendered in TIFF, and the TIFF will be redacted and produced. However, to the extent that the
21 text is searchable in the native format, the producing party will still provide searchable text for those
22 portions of the document that have not been redacted. The word "Redacted," as searchable text, should
23 be placed over each redaction made within a document. Redacted documents must be produced with all
24 metadata fields identified in Appendix B, unless those metadata fields potentially contain privileged
25 information. Where redactions are made based on a claim of privilege, documents must also be logged
26 in the manner set forth in Appendix C.

27 19. **Fully withheld documents.** Any documents that are fully withheld based on a claim of
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1 privilege shall be assigned a unique document control number on the privilege log, also known as a
2 privilege log ID number, and be logged in the manner provided in Appendix C.

3 20. **Clawback procedure.** Any request to recall a document shall be made in writing and
4 shall identify the original volume(s) for the document(s) that are being clawed back. For each document
5 clawed back, a replacement production shall be made. This replacement production shall consist of a
6 placeholder indicating that the document is privileged and shall be Bates numbered with the first Bates
7 number of the original document. The replacement production should also follow the requirements set
8 forth in Appendix C.

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1 **III. PRODUCTION OF PHYSICALLY STORED INFORMATION (HARD COPY**
2 **DOCUMENTS**

3 21. **TIFFs.** Hard copy paper documents shall be scanned as single-page, Group IV
4 compression TIFF images using a print setting of at least 300 dots per inch (DPI). Each image shall have
5 a unique file name, which is the Bates number of the document. Original document orientation shall be
6 maintained (i.e., portrait to portrait and landscape to landscape).

7 22. **Metadata Fields.** The following information shall be produced for hard copy documents
8 and provided in the data load file at the same time that the TIFF images and the Optical Character
9 Recognition (OCR) acquired text files are produced. Each metadata field shall be labeled as listed
10 below:

Field Name	Example / Format	Description
BATES BEG	ABC0000001 (Unique Bates)	The Unique Bates number associated with the first page of a document.
BATES END	ABC0000003 (Unique Bates)	The Unique Bates number associated with the last page of a document.
BATES BEG ATTACH	ABC0000001 (Unique Bates Parent-Child Relationships)	The Unique Bates number associated with the first page of the parent document (if applicable).
BATES END ATTACH	ABC0000008 (Unique Bates Parent-Child Relationships)	The Unique Bates number associated with the last page of the last attachment (if applicable).
PAGES	3 (Numeric)	The total number of pages in the document.
CUSTODIAN		The custodian / source of a document.
PARENT BATES BEG	ABC0000001 (Unique Bates Parent-Child Relationships)	The unique bates number associated with the first page of a parent document. Note: This field will only be populated in child records.

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26 23. **OCR Acquired Text Files.** When subjecting physical documents to an OCR process, the
27 settings of the OCR software shall maximize text quality over process speed. Any settings such as “auto-
28 skewing,” “auto-rotation” and the like should be turned on when documents are run through the process.

1 24. **Database Load Files/Cross-Reference Files.** Documents shall be provided with (i) a
2 delimited metadata file (.dat) and (ii) an image load file (.opt), as detailed in Appendix A.

3 25. **Unitizing of Documents.** In scanning paper documents, distinct documents shall not be
4 merged into a single record, and single documents shall not be split into multiple records (e.g., paper
5 documents should be logically unitized). In the case of an organized compilation of separate
6 documents—for example, a binder containing several separate documents behind numbered tabs—the
7 document behind each tab should be scanned separately, but the relationship among the documents in
8 the binder should be reflected in proper coding of the beginning and ending document and attachment
9 fields. The parties will make their best efforts to unitize documents correctly.

10 **IV. ADDITIONAL PROVISIONS GOVERNING DISCOVERY**

11 26. **Proportionality.** Nothing in this ESI Protocol shall be construed to alter the producing
12 party’s rights arising under Cal. Civ. Proc. Code § 2017.010 or otherwise, for example, with respect to
13 proportionality, or to be able to withhold production of Documents because the source of the Documents
14 is not reasonably accessible or its production would be unduly burdensome or duplicative.

15 27. **Exclusions.** The following privileged or otherwise protected documents or
16 communications may be excluded from privilege logs: (1) documents or communications sent solely
17 between or among counsel for Amazon.com, Inc. (“Amazon”) and their respective legal staff (e.g.,
18 paralegals, administrative assistants, technical staff) and (2) documents or communications sent solely
19 between or among counsel for the People of the State of California (“The People”) and their respective
20 legal staff (e.g., paralegals, administrative assistants, technical staff), where counsel includes both in-
21 house counsel for a party and outside counsel retained by either party in connection with the subject
22 matter of this Action. The parties may agree to exclude additional categories of privileged or otherwise
23 protected communications from privilege logs.

24 28. **Foreign Data Privacy Laws.** Nothing in this Order is intended to prevent either party
25 from complying with the requirements of a foreign country’s data privacy laws, e.g., the European
26 Union’s General Data Protection Regulation (GDPR) (EU) 2016/679. The parties agree to meet and
27 confer before including custodians or data sources subject to such laws in response to any ESI or other
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1 discovery request.

2 29. **“Cloned” or “Deemed Produced” Documents.** Documents that are not produced in the
3 first instance in this litigation, i.e., documents that were previously produced in other matters (including
4 investigations) and are deemed produced or are reproduced in this matter, shall be produced in the
5 format of document productions in those other matters.

6 30. **Email Threading.** The parties may use analytics technology to identify email threads
7 and need only produce the unique most inclusive copy and related family members and may exclude
8 lesser inclusive non-unique copies. Lesser inclusive copies that include unique attachments shall be
9 produced. Upon reasonable request, the producing party will produce a less inclusive copy of a given
10 email message.

11 31. **Privilege.** The production of any documents in this proceeding, whether inadvertent or
12 otherwise, shall not, for the purposes of this proceeding or any other federal or state proceeding,
13 constitute a waiver by the producing party of any privilege applicable to those documents, including the
14 attorney-client privilege, attorney work-product protection, or any other privilege or protection
15 recognized by law. Information produced in discovery that is protected as privileged or work product
16 shall be immediately returned to the producing party or destroyed, and its production shall not constitute
17 a waiver of such protection.

18 32. **Preservation of Certain ESI.** The categories of ESI that need not be preserved include
19 but are not limited to:

- 20 a. Random access memory (RAM), temporary files, or other ephemeral data that are
21 difficult to preserve without disabling the operating system.
- 22 b. On-line access data such as temporary internet files, history, cache, cookies, and the like.
- 23 c. Interim automatically saved drafts, as opposed to drafts saved by a user.
- 24 d. Data in metadata fields that are frequently updated automatically, such as last-opened
25 dates (see also Section (E)(5)).
- 26 e. Dynamic fields of databases or log files that are not retained in the usual course of
27 business.
- 28 f. Back-up data that are duplicative of data that are more accessible elsewhere.
- g. Server, system or network logs.

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- h. Electronic data (e.g., email, calendars, contact data, and notes) sent to or from mobile devices (e.g., iPhone, iPad, Android devices), provided that a copy of all such electronic data is automatically saved in real time elsewhere (such as on a server, laptop, desktop computer, or “cloud” storage)
33. Parties will preserve materials as appropriate and required under California state law.

1 **APPENDIX A: REQUESTED LOAD FILE FORMAT FOR ESI**

2 34. **Image File Format:** All images, paper documents scanned to images or rendered ESI,
3 shall be produced as 300 dpi single-page, CCITT Group IV TIFF images (for black/white) or JPG
4 images (for color). Documents should be uniquely and sequentially Bates numbered with an
5 endorsement burned into each image.

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- 7 a. All TIFF/JPG image file names shall include the unique Bates number burned into the image.
 - 8 b. Each Bates number shall be a standard length, include leading zeros in the number and be unique for each produced page.
 - 9 c. All TIFF/JPG image files shall be named with a “.tif” or “.jpg” extension.
 - 10 d. Images should be able to be OCR'd using standard software, such as LexisNexis LAW PreDiscovery, Ipro, etc.
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12 35. **Concordance Image Cross-Reference file (.opt):** Images shall be accompanied by a
13 Concordance Image Cross-Reference file (.opt) that associates each Bates number with its
14 corresponding single-page TIFF/JPG image file. The Cross-Reference file should also contain the image
15 file path for each Bates numbered page.

16 Image Cross-Reference Sample Format:

17 ABC000001,OLS,D:\DatabaseName\Image\001\ABC000001.TIF,Y,,,
18 ABC000002,OLS,D:\DatabaseName\Image\001\ABC000002.TIF,,,,
19 ABC000003,OLS,D:\DatabaseName\Image\001\ABC000003.TIF,,,,
20 ABC000004,OLS,D:\DatabaseName\Image\001\ABC000004.TIF,Y,,,

21 36. **Concordance Load File (.dat):** Images shall also be accompanied by a “text load file”
22 containing delimited text (DAT file) that will populate fields in a searchable, flat database environment.
23 The delimiters for the load file should be Concordance defaults.

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- 25 a. Comma: ¶ ASCII character (020)
 - 26 b. Quote: ¨ ASCII character (254)
 - 27 c. Newline: ® ASCII character (174)
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APPENDIX B: REQUESTED METADATA FIELDS FOR ESI¹

	Field Name	Example / Format	Description
1.	PARENT BATES BEG	ABC0000001 (Unique Bates Parent-Child Relationships)	The Unique Bates number associated with the first page of a parent document. Note: This field will only be populated in child records.
2.	BATES BEG	ABC0000001 (Unique Bates)	The Unique Bates number associated with the first page of a document.
3.	BATES END	ABC0000003 (Unique Bates)	The Unique Bates number associated with the last page of a document.
4.	BATES BEG ATTACH	ABC0000001 (Unique Bates Parent- Child Relationships)	The Unique Bates number associated with the first page of the parent document.
5.	BATES END ATTACH	ABC0000008 (Unique Bates Parent- Child Relationships)	The Unique Bates number associated with the last page of the last attachment.
6.	PAGES	3 (Numeric)	The total number of pages in the document.
7.	EMAIL RECEIVED DATE/TIME	MM/DD/YYYY HH:MM:SS	The date and time the email was received.
8.	EMAIL SENT DATE/TIME	MM/DD/YYYY HH:MM:SS	The date and time the email was sent.
9.	CREATED DATE TIME	MM/DD/YYYY HH:MM:SS	The date and time the document was created.
10.	LAST MODIFIED DATE/TIME	MM/DD/YYYY HH:MM:SS	The date and time the document was last modified.
11.	SORT DATE/TIME	MM/DD/YYYY HH:MM:SS	For parent documents, the field is populated with the Primary Date/Time value. For child documents, the field is populated with the Sort Date/Time of the parent document. For loose electronic files: the last modified date/time of the document.

¹ Data productions will contain only the fields necessary to load the material into document review databases properly.

	Field Name	Example / Format	Description
12.	SOURCE PATH	i.e. Joe Smith/Email/Inbox Joe Smith/Email/Deleted Items Joe Smith/Loose Files/Accounting/... Joe Smith/Loose Files/Documents and Settings/...	Location of the original document. The source should be the start of the full path.
13.	HAS HIDDEN DATA	Yes/No	Indication of the existence of hidden document data such as hidden text in a Word document, hidden columns, rows, or worksheets in Excel, or slide notes in PowerPoint. [If convenient, the contents of fields 13-15 may be condensed into a single "Hidden Data" field, so long as it contains all three categories of information.]
14.	TRACK CHANGES	Yes/No	Whether Track Changes are present in a Microsoft Word document.
15.	SPEAKER NOTES	Yes/No	Whether speaker notes are present in a PowerPoint presentation.
16.	AUTHOR	jmoralez	The author of a document from entered metadata.
17.	EMAIL FROM	Juanita Morales <jmoralez@email.com>	The display name and email address of the sender of an email message. If the display name is not available, then the email address alone may be provided in this field. An email address must be provided for the sender of every email message, except for files where that information does not exist (e.g., a draft).

	Field Name	Example / Format	Description
18.	EMAIL TO	Juanita Morales <jmoralez@email.com> <u>mail</u> to:; Yukari Mukumoto <ymukumoto@email.com>	The display name(s) and email address(es) of the recipient(s) of an email message. If display names are not available, then the email address(es) alone may be provided in this field. Email address(es) of recipient(s) must be provided for every email message, except for files where that information does not exist (e.g., a draft).
19.	EMAIL CC	Juanita Morales <jmoralez@email.com> <u>mail</u> to:; Yukari Mukumoto <ymukumoto@email.com>	The display name(s) and email address(es) of the Carbon Copy recipient(s) of an email message. If display name(s) are not available, then the email address(es) alone may be provided for this field. The email address(es) of all Carbon Copy recipients must be provided for every email message, except for files where that information does not exist (e.g., a draft).
20.	EMAIL BCC	Juanita Morales <jmoralez@email.com> <u>mail</u> to:; Yukari Mukumoto <ymukumoto@email.com>	The display name(s) and email address(es) of the Blind Carbon Copy recipient(s) of an email message. If display name(s) are not available, then the email address(es) alone may be provided for this field. The email address(es) of all Blind Carbon Copy recipients must be provided for every email message, except for files where that information does not exist (e.g., a draft).
21.	EMAIL SUBJECT	Re: Scheduling Meeting	The subject line of an email message.
22.	TITLE		The extracted document title or subject of a document from entered metadata. This field may not be applicable to email messages.

	Field Name	Example / Format	Description
23.	CUSTODIAN		The custodian or source of a document. If the documents are de-duped on a global level, this field should also contain the name of each custodian from which the document originated.
24.	NUMBER OF ATTACHMENTS	3 (Numeric)	The total number of attachments to a document.
25.	FILE EXTENSION	DOC, XLS	The file extension of a document.
26.	FILE NAME	Document Name.xls	The file name of a document.
27.	HASH		The MD5 or SHA-1 Hash value.
28.	NATIVELINK	D:\NATIVES\ABC000001.xls	The full path to a native copy of a document.
29.	FULLTEXT	D:\TEXT\ABC000001.txt	The path to the full extracted text of the document. There should be a folder on the deliverable, containing a separate Unicode text file per document. These text files should be named with Bates numbers equivalent to the Bates number for the first page of a particular document. Note: Extracted text for emails should include header information: author, recipient, cc, bcc, date, subject, attachment, names, etc. If the attachment or e-file does not extract any text, then OCR for the document should be provided.
30.	REDACTED	Has Redaction	Descriptor for documents that have been redacted.

1 **APPENDIX C: ADDITIONAL INSTRUCTIONS FOR DOCUMENTS REDACTED OR**
2 **WITHHELD ON THE BASIS OF PRIVILEGE**

3 37. All documents that are withheld in whole or in part from production based on a claim of
4 privilege by any above-captioned party or party responding to a non-party subpoena, must comply with
5 the requirements set forth in this Appendix.

6 38. Documents should also comply with the technical requirements for redacted and withheld
7 documents set forth in this document.

8 39. The parties' privilege logs shall conform with the following requirements:

- 9 a. Each document or document family that is withheld in whole or in part from production
10 based on a claim of privilege shall be assigned unique document control numbers, also
11 known as privilege log ID numbers;
- 12 b. For purposes of this instruction, each attachment to a document shall be treated as a
13 separate document and separately logged, if withheld, and cross referenced, if produced;
- 14 c. The parties must provide a statement of the claim of privilege (for example, "Attorney
15 Work Product" or "Attorney-Client Privilege" and a description explaining the decision
16 to withhold each document in the form of a privilege log that conforms with the
17 requirements set forth below.
- 18 d. The privilege log must be produced as a searchable and sortable Microsoft Excel
19 spreadsheet;
- 20 e. The names of counsel shall be designated with an asterisk where they appear on the log;
- 21 f. The privilege log must be clearly numbered and titled using the following naming
22 convention: "YYYY.MM.DD_Privilege Log [X]"; and
- 23 g. The privilege log must contain, in a separate tab, a legend containing the full name,
24 title(s), employer, or affiliation of each author, addressee, and recipient identified on each
25 party's privilege log.

26 40. For each document identified on a privilege log, provide the following information,
27 unless it contains privileged material. Note that the values for these fields are the same values described
28 in Appendix A:

	FIELD NAME	DESCRIPTION
1.	PRIVILEGE LOG ID NUMBER	Each privilege log entry must have a unique control number assigned to it.
2.	PARENT BATES BEG	The Unique Bates number associated with the first page of a parent document, regardless of whether any privilege is being asserted for such parent. Note: This field will only be populated in child records.
3.	BATES BEG	For documents that have been partly withheld or redacted, provide the Bates number associated with the first page of the document, as previously produced.
4.	BATES END	For documents that have been partly withheld or redacted, provide the Bates number associated with the last page of the document, as previously produced.
5.	BATES BEG ATTACH	For documents that have a partly withheld or redacted family, the Unique Bates number associated with the first page of the parent document.
6.	BATES END ATTACH	For documents that have a partly withheld or redacted family, the Unique Bates number associated with the last page of the last attachment.
7.	RECORD TYPE	This is the same as Metadata Field No. 29, as reflected in Appendix B above.
8.	PAGES	This is the same as Metadata Field No. 6, as reflected in Appendix B above.
9.	EMAIL SENT DATE/TIME or CREATED DATE/TIME	This is the same as Metadata Field Nos. 8 & 9, reflected in Appendix B above.
10.	EMAIL FROM or AUTHOR	This is the same as Metadata Field Nos. 15 & 16, reflected in Appendix B above.
11.	EMAIL TO	This is the same as Metadata Field No. 17, reflected in Appendix B above.
12.	EMAIL CC	This is the same as Metadata Field No. 18, reflected in Appendix B above.
13.	EMAIL BCC	This is the same as Metadata Field No. 19, reflected in Appendix B above.
14.	EMAIL SUBJECT / TITLE	This is the same as Metadata Field Nos. 20 & 21, reflected in Appendix B above.
15.	CUSTODIAN	This is the same as Metadata Field No. 22, reflected in Appendix B above.
16.	PRIVILEGE TYPE	The nature or type of the privilege that the party is asserting for the document (e.g., "Attorney-Client Privilege" or "Attorney Work Product")

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	FIELD NAME	DESCRIPTION
17.	PARTIALLY PRIVILEGED or WITHHELD	Whether the document is partially privileged (and produced with redactions) or wholly privileged (and has been withheld).
18.	DESCRIPTION	A description of the subject matter of the document that provides sufficiently detailed information to enable the parties to assess the applicability of the privilege claimed, without revealing information that is itself privileged.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

2 DATED: 4/28/2023

Respectfully Submitted,

3 By: /s/ Anik Banaerjee

By: /s/ Jeffrey M. Davidson

4 Rob Bonta
5 Attorney General of California

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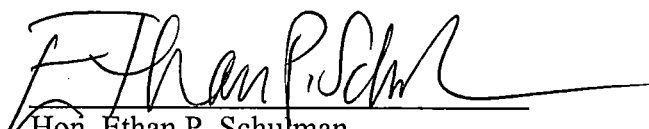
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23 *California*

Attorneys for Defendant Amazon.com, Inc.

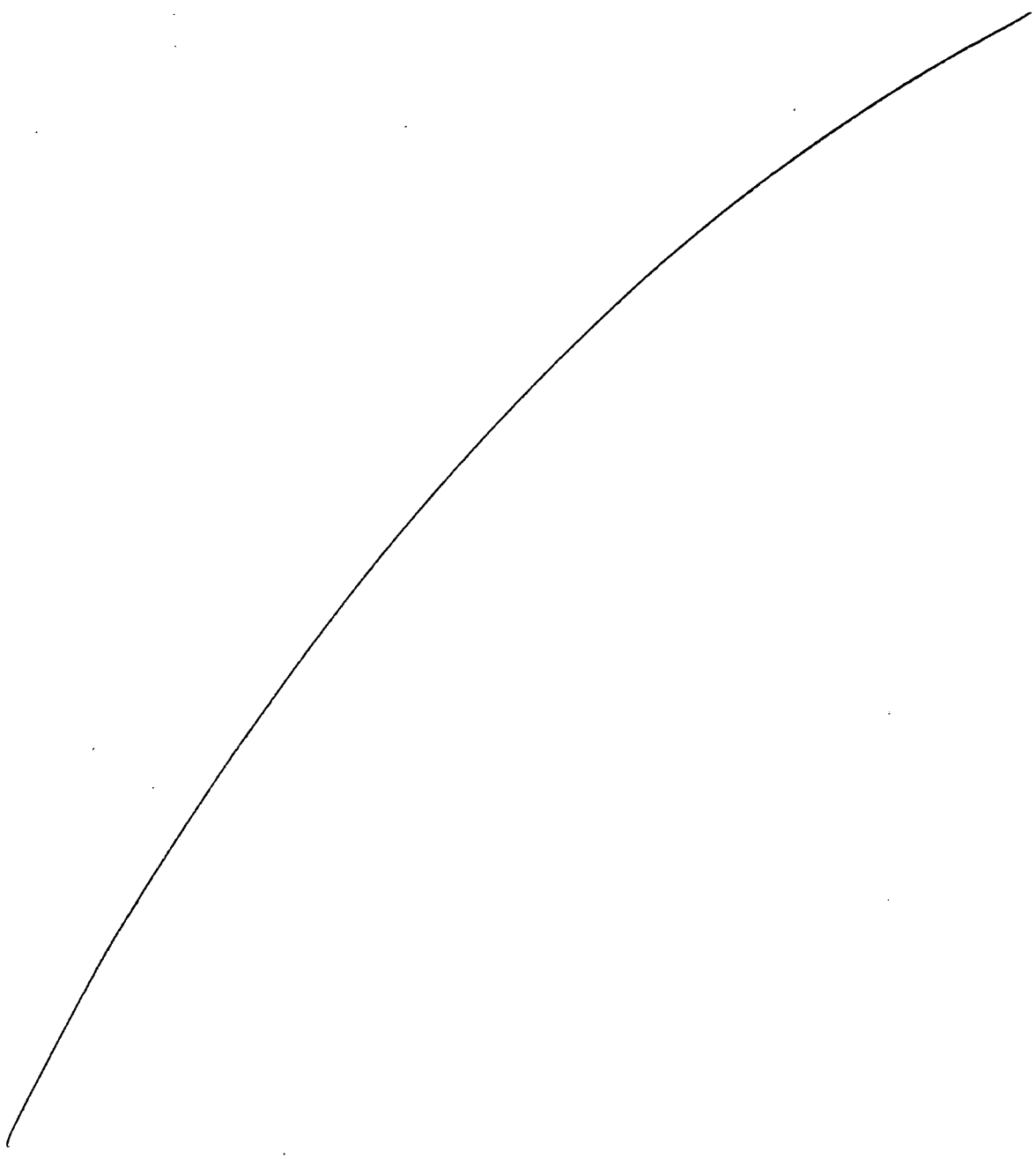

[PROPOSED] ORDER

Pursuant to the above stipulation, IT IS SO ORDERED

DATED: Apr. 28, 2023


Hon. Ethan P. Schulman
Judge of the Superior Court

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CERTIFICATE OF ELECTRONIC SERVICE
(CCP 1010.6(6) & CRC 2.260(g))

I, Felicia Green, a Deputy Clerk of the Superior Court of the County of San Francisco, certify that I am not a party to the within action.

On April 28, 2023, I electronically served STIPULATED ELECTRONICALLY STORED INFORMATION PROTOCOL AND ORDER via File & ServeXpress on the recipients designated on the Transaction Receipt located on the File & ServeXpress website.

Dated: **APR 28 2023**

Mark Culkins, Interim Chief Executive Officer

By: *Felicia Green*
Felicia Green, Deputy Clerk