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 11 Attorneys for Plaintiff
 12 Art of Living Foundation

10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 **ART OF LIVING FOUNDATION, a**
 13 California corporation,
 14 Plaintiff,
 15 vs.
 16 **DOES 1-10, inclusive,**
 17 Defendants.

Case No. 10-cv-5022 LHK (HRL)

**PLAINTIFF'S NOTICE OF
 ADMINISTRATIVE MOTION AND
 ADMINISTRATIVE MOTION TO
 CONSIDER WHETHER CASES ARE
 RELATED; MEMORANDUM OF
 POINTS AND AUTHORITIES IN
 SUPPORT THEREOF; [PROPOSED]
 ORDER**

Date: In Chambers
 Time: In Chambers
 Ctrm: In Chambers

Before The Hon. Lucy H. Koh

1 TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL:

2 PLEASE TAKE NOTICE THAT pursuant to Northern District of California Civil
3 Local Rule 3-12 (“Local Rule 3-12”), Plaintiff Art of Living Foundation (“Plaintiff” or “Art of
4 Living”) hereby moves the Court for an order relating the following case:

- 5 • *Art of Living Foundation v. Eng-An Chou*, No. 12-CV-2748 PSG (N.D. Cal.)

6 This Motion is based on Plaintiff’s Memorandum of Points and Authorities set forth
7 below, and all pleadings on file in this case.

8 Defendant Skywalker stipulates to the relation of the two cases.

9
10 DATED: June 1, 2012

KRONENBERGER ROSENFELD, LLP

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12 By: s/ Karl S. Kronenberger
13 Karl S. Kronenberger

14 Attorneys for Plaintiff,
15 Art of Living Foundation
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MEMORANDUM OF POINTS AND AUTHORITIES

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Local Rule 3-12 provides that whenever a party knows or learns that an action, filed in or removed to this district, is related to an action which is or was pending in this District, the party must promptly file in the earliest-filed case an Administrative Motion to Consider Whether Cases Should be Related. Plaintiff hereby moves the Court for an order granting the relationship of this case to the case styled *Art of Living Foundation v. Eng-An Chou*, No. 12-CV-2748 PSG (the “Chou Action”), and order that the Clerk reassign the Chou Action to the Honorable Lucy H. Koh.

Actions are related when they concern substantially the same parties, property, transaction or event, or where it appears that it will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different judges. L. Civ. R. 3-12.

Both this action and the Chou Action involve the same plaintiff: The Art of Living Foundation. In this action, Plaintiff has alleged that pseudonymous Defendant Skywalker misappropriated Plaintiff’s trade secrets by posting portions of Plaintiff’s confidential texts on the blog located at <aolfree.wordpress.com>. In particular, Plaintiff has alleged that Skywalker posted the text of Plaintiff’s Sudarshan Kriya Notes. In the Chou Action, Plaintiff has alleged that Defendant Chou breached her contracts with Plaintiff by disclosing the Sudarshan Kriya Notes to Skywalker.

Thus, this action and the Chou Action concern substantially the same parties, property, or event, and should be considered related cases.

STIPULATION BY DEFENDANT SKYWALKER

Defendant Skywalker stipulates to the relation of the two cases.

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1 **CONCLUSION**

2 Based on the foregoing, Plaintiff respectfully requests that the Court issue an
3 order, pursuant to Local Rule 3-12, relating this case to the Chou Action and ordering the
4 Clerk to reassign the Chou Action to the Honorable Lucy H. Koh.

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6 Respectfully submitted,

7 DATED: June 1, 2012

KRONENBERGER ROSENFELD, LLP

8
9 By: s/ Karl S. Kronenberger
10 Karl S. Kronenberger

11 Attorneys for Plaintiff,
12 Art of Living Foundation

13 DEFENDANT SKYWALKER STIPULATES to the relation of the two cases.

14 DATED: June 1, 2012

15 By: s/ Joshua Koltun
16 Joshua Koltun

17 Attorney for Defendant Doe/Skywalker
18

19 **ATTESTATION OF CONCURRENCE IN FILING**

20 Pursuant to General Order No. 45, Part X.B, the filer hereby attests that
21 concurrence in the filing of this document has been obtained from each of the other
22 signatories, which shall serve in lieu of their signatures on the document.
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1 **[PROPOSED] ORDER**

2 Having considered Plaintiff's Administrative Motion to Consider Whether Cases
3 Should be Related and good cause having been shown,

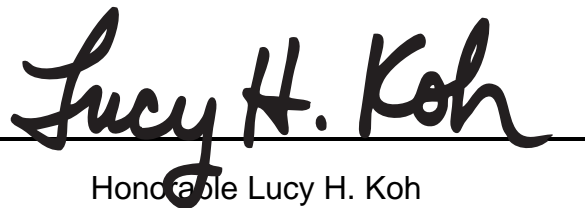
4 IT IS HEREBY ORDERED that Plaintiff's Motion is GRANTED.

5 IT IS HEREBY FURTHER ORDERED that this case is related to the case styled
6 *Art of Living Foundation v. Eng-An Chou*, No. 12-CV-2748 PSG (the "Chou Action").

7 IT IS HEREBY FURTHER ORDERED that the Clerk shall reassign the Chou
8 Action to the Honorable Lucy H. Koh.

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10 IT IS SO ORDERED.

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12 Dated: June 8, 2012

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Honorable Lucy H. Koh

United States District Judge