

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Mary Pattison v. HP Inc.

Pattison v. HP Inc. · No. 24-cv-02752-MMC (KAW) · Decided December 2, 2025

SUMMARY

The court resolves two discovery-letter disputes in a putative class action concerning HP Care Pack rebate administration. The court orders HP to provide specified interrogatory responses and produce documents responsive to certain requests for production, subject to a protective order and privilege-log requirements.

CASE DETAILS

COURT	United States District Court for the Northern District of California
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 2, 2025
DOCKET	24-cv-02752-MMC (KAW)
DISPOSITION	other
PROCEDURAL POSTURE	The court resolved two joint discovery letters concerning Plaintiff's interrogatories and requests for production in a putative class action.
STANDARD OF REVIEW	Discovery relevance and proportionality under the Federal Rules of Civil Procedure; the court also considered whether alleged burden was undue and whether privacy concerns were adequately addressed by a protective order.
PRECEDENTIAL VALUE	Unknown
PARTIES	Mary Pattison v. HP Inc.

TOPICS

- discovery dispute
- class actions
- civil procedure
- consumer protection
- commercial litigation

PRACTICE AREAS

- civil procedure
- class actions
- consumer protection
- commercial litigation

QUESTIONS PRESENTED

1. Whether discovery identifying purchasers who fell within the putative class definition, including their contact information and purchase information, was relevant and discoverable before class certification.
2. Whether HP established undue burden or insufficient data integration to avoid responding to the requested class-member discovery.
3. Whether privacy concerns barred production of putative class members' personally identifying information despite the existence of a stipulated protective order.
4. Whether the disputed requests for information concerning all Care Pack purchasers or purchasers who experienced service events were relevant to the putative class claims.
5. Whether HP was required to search for and produce responsive rebate-related emails, including emails in former employees' inboxes.

HOLDINGS

1. A putative class representative is entitled to reasonable pre-certification discovery identifying members of the proposed class, including contact information and relevant purchase and rebate information.
2. Discovery seeking information about all Care Pack purchasers or purchasers who experienced covered service events was overbroad and need not be answered when the proposed class was limited to purchasers who did not experience a service event.
3. The fact that responsive information is maintained in separate electronic databases and requires cross-referencing does not, without more, establish undue burden sufficient to avoid relevant discovery.
4. Privacy interests in putative class members' contact information did not bar production where the plaintiff demonstrated a legitimate need and the information could be disclosed subject to a protective order.
5. HP was required to search for and produce responsive internal emails concerning customer complaints about Care Pack rebates and rebate-processing delays, including responsive emails in former employees' inboxes to the extent such emails existed.

KEY QUOTATIONS

“Plaintiff is entitled to reasonable pre-certification discovery of the putative class members’ contact information.” (at 2)

“Electronic records will allow cross-referencing to be significantly more manageable.” (at 3)

“The predominant practice among courts in the Northern District of California is to allow pre-certification discovery of putative class members’ confidential contact information subject to a protective order.” (at 4)

FACTUAL BACKGROUND

HP marketed Care Packs as a risk-free service program under which purchasers who experienced no service event involving covered equipment for three years could obtain a full rebate of the Care Pack cost after submitting a rebate form. Pattison alleged that HP failed to properly administer the program and timely pay rebates. She sought discovery identifying putative class members, including purchasers who had no service

events and customers whose rebates were unpaid or untimely, as well as documents concerning complaints, rebate communications, and the program's administration.

PROCEDURAL HISTORY

Pattison filed a putative class action alleging that HP improperly administered its risk-free Care Pack rebate program. After multiple rounds of pleading motions, the parties submitted Discovery Letter Nos. 1 and 2 concerning disputed interrogatories and requests for production. The court ordered HP to provide specified discovery, produce a privilege log for certain materials if applicable, and complete production within 30 days.

DISPOSITION

other

CASES CITED

- *Ulloa v. Securitas Sec. Servs. USA, Inc.*, No. 23-cv-01752-DMR, 2024 U.S. Dist. LEXIS 114763, at *5 (N.D. Cal. June 28, 2024)
- *Amaraut v. Sprint/United Mgmt. Co.*, No. 3:19-cv-411-WQH-AHG, 2020 U.S. Dist. LEXIS 7558, at *16, *20-21 (S.D. Cal. Jan. 14, 2020)
- *Nguyen v. Baxter Healthcare Corp.*, 275 F.R.D. 503, 506-08 (C.D. Cal. 2011)
- *In re Williams-Sonoma, Inc.*, 947 F.3d 535, 537-40 (9th Cir. 2020)
- *Stemple v. QC Holdings, Inc.*, No. 12-cv-1997-CAB (WVG), 2013 U.S. Dist. LEXIS 99582, at *11 (S.D. Cal. June 17, 2013)
- *Austin v. Foodliner, Inc.*, No. 16-cv-7185-HSG (DMR), 2018 U.S. Dist. LEXIS 36685, at *4-5 (N.D. Cal. Mar. 6, 2018)