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 20 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
 21 **OAKLAND DIVISION**

22 J.H., individually and as next of friend to  
 minor plaintiffs N.R. and A.M.,

23 Plaintiffs,

24 v.

25 META PLATFORMS, INC., et al.,

26 Defendants.  
 27  
 28

CASE NO. 4:22-cv-04710-HSG

**STIPULATION AND ORDER TO STAY  
 PROCEEDINGS PENDING JPML RULING**

Judge: Hon. Haywood S. Gilliam, Jr.  
 Courtroom: 2, 4th Floor

1 **STIPULATION**

2 Pursuant to Civil Local Rule 7-12, Plaintiffs J.H., N.R., and A.M., and Defendants Meta  
3 Platforms, Inc., YouTube, LLC, Google LLC, Alphabet Inc., Snap, Inc., TikTok Inc., and ByteDance  
4 Inc. (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as  
5 follows:

6 WHEREAS, there is a currently pending motion asking the Judicial Panel on Multidistrict  
7 Litigation (the “MDL Panel”) to centralize this case with 28 other actions similar to this action and to  
8 transfer the centralized actions to a different district (Mot. for Transfer and Coordination or  
9 Consolidation under 28 U.S.C. § 1407, *In re Social Media Adolescent Addiction/Personal Injury*  
10 *Product Liability Litigation*, MDL No. 3047 (J.P.M.L.) [the “MDL Transfer Motion”]);

11 WHEREAS, the Parties believe that the MDL Panel has set the MDL Transfer Motion for  
12 consideration at its next hearing session, which is scheduled for September 29, 2022;

13 WHEREAS, stays have already been entered in other cases pending in this District that are  
14 the subject of the MDL Transfer Motion (*See, e.g.,* Order, *Rodriguez v. Meta Platforms, Inc.*, No.  
15 3:22-cv-00401 (N.D. Cal. Aug. 2, 2022), ECF No. 100 [“In light of the JPML proceedings, MDL No.  
16 3047, the case is stayed pending further order.”]; Order, *Heffner v. Meta Platforms, Inc.*, No. 3:22-cv-  
17 03849 (N.D. Cal. Aug. 2, 2022), ECF No. 13 [same]; Order, *Aranda v. Meta Platforms, Inc.*, No.  
18 3:22-cv-04209 (N.D. Cal. Aug. 2, 2022), ECF No. 13 [same]; Order, *Roberts v. Meta Platforms, Inc.*,  
19 No. 4:22-cv-04210 (N.D. Cal. Aug. 15, 2022), ECF No. 22 [same]; Order, *Wuest v. Meta Platforms,*  
20 *Inc.*, No. 4:22-cv-04283 (N.D. Cal. Aug. 15, 2022), ECF No. 19 [same]; Order, *Martin v. Meta*  
21 *Platforms, Inc.*, No. 3:22-cv-04286 (N.D. Cal. Aug. 15, 2022), ECF No. 17 [same]; Order, *Seekford*  
22 *v. Meta Platforms, Inc. et al.*, No. 4:22-cv-03883 (N.D. Cal. Aug. 15, 2022), ECF No. 18 [same];  
23 Order, *Spence v. Meta Platforms, Inc.*, No. 4:22-cv-03294 (N.D. Cal. Aug. 19, 2022), ECF No. 29  
24 [same]; Order, *Flatt v. Meta Platforms, Inc. et al.*, No. 3:22-cv-04535 (N.D. Cal. Aug. 19, 2022),  
25 ECF No. 16 [same]; Order, *M.C. v. Meta Platforms, Inc. et al.*, No. 4:22-cv-04529 (N.D. Cal. Aug.  
26 22, 2022), ECF No. 26 [same]; Order, *T.K. v. Meta Platforms, Inc. et al.*, No. 3:22-cv-04588 (N.D.  
27 Cal. Sept. 1, 2022), ECF No. 15 [same];

1 WHEREAS, if the stipulation for the entry of a stay is denied or is not acted upon prior to  
2 September 12, the Parties stipulate to a revised responsive deadline for Defendants of October 12,  
3 2022, unless the Court orders otherwise.

4 NOW THEREFORE, the Parties, through their undersigned counsel, hereby stipulate, agree,  
5 and respectfully request that the Court enter an Order establishing the following:

6 1. All proceedings and deadlines, including but not limited to the requirement for  
7 Defendants to move to dismiss, answer, or otherwise respond to the Complaint, shall be STAYED in  
8 this action pending further order of the court following the decision of the JPML on the pending  
9 MDL Transfer Motion (MDL No. 3047);

10 2. In the event the JPML does not transfer this case pursuant to 28 U.S.C. § 1407,  
11 Defendants shall have 30 days from the date of the MDL Panel's decision to respond to Plaintiffs'  
12 Complaint. Should Defendants file any motion requiring a response from Plaintiffs, Plaintiffs shall  
13 have 45 days to respond to such a motion and Defendants shall have 21 days to file any reply; and

14 3. The Parties reserve all other rights, including but not limited to, with respect to any  
15 position taken by the Parties before the MDL Panel, Plaintiffs' ability to dismiss their claims against  
16 any Defendants during the pendency of the stay, and Defendants' ability to object to issues related to  
17 service and/or jurisdiction.

18 **IT IS SO STIPULATED.**

19 Respectfully submitted,

20 Dated: September 9, 2022

GIBSON, DUNN & CRUTCHER LLP

21  
22 By:           /s/ Rosemarie T. Ring            
          Rosemarie T. Ring

23 *Attorneys for Defendant Meta Platforms, Inc.*

24  
25 Dated: September 9, 2022

COVINGTON & BURLING LLP

26  
27 By:           /s/ Ashley M. Simonsen            
          Ashley M. Simonsen

28 *Attorneys for Defendant Meta Platforms, Inc.*





