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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

REPUBLICAN NATIONAL COMMITTEE,
 	
                   Plaintiff,
 	
          v.
 	
GOOGLE LLC,
 	
                   Defendant.
	Case No. 2:22-cv-01904-DJC-JDP
	
	STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE AND CONTINUE THE HEARING DATE ON DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT
	
	Dept: Courtroom 10, 13th Floor
	Judge: Hon. Daniel J. Calabretta

1   Plaintiff the Republican National Committee ("Plaintiff") and Defendant Google

2   LLC ("Defendant") (collectively, the "Parties"), by and through their undersigned

3   counsel, stipulate as follows:

4   1.   The RNC filed its Verified First Amended Complaint [Dkt. No. 58] on

5   October 10, 2023;

6   2.   On November 16, 2023, Defendant filed its Motion to Dismiss Plaintiff's

7   First Amended Complaint [Dkt. No. 60] (the "Motion");

8   3.   The hearing on the Motion is currently noticed for January 18, 2024 at

9   1:30 p.m. [Dkt. No. 60];

10   4.   Under the default schedule established by this Court's local rules for civil

11   cases, Plaintiff's brief in opposition to the Motion is currently due on or before

12   November 30, 2023, and Defendant's reply brief in support of the Motion is currently

13   due on or before December 11, 2023;

14   5.   Due to the complexity of the issues, multiple upcoming holidays, family

15   travel, and the press of other business, good cause exists to extend the briefing

16   schedule and continue the hearing date;

17   6.   The Parties have worked with the Court's deputy to determine that March

18   14, 2023 is a mutually-agreeable date for the Parties and the Court for oral argument

19   on the Motion;

20   7.   This Court's Standing Order in Civil Cases requires stipulations to include

21   "the discovery cut-off date, last date for hearing motions, pre-trial conference date,

22   and trial date," but these dates have not yet been established in this case as the case is

23   still at the pleading stage;

24   8.   There have been no prior extensions requested by the Parties on the

25   briefing schedule or hearing on this Motion;

26   9.   The Parties agree that neither party will suffer any prejudice if the Court

27   grants the relief requested herein;

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THEREFORE, the Parties jointly and respectfully request that the Court vacate

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the current deadlines and the January 18, 2024 hearing date and set the following

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schedule for the Motion:

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     a.   Plaintiff's opposition brief shall be due on or before

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           January 9, 2024;

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     b.   Defendant's reply brief shall be due on or before

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           February 8, 2024; and

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     c.   The hearing shall occur on March 14 at 1:30 p.m. in Courtroom 10

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           before District Judge Daniel J. Calabretta.

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IT IS SO STIPULATED.

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Dated: November 21, 2023

By: /s/ *Michael R. Huston*

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CASE NO. 2:22-CV-01904-DJC-JDP
STIPULATION AND ORDER RE BRIEFING SCHEDULE AND HEARING ON MTD FAC

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ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ *Michael R. Huston*
Michael R. Huston, pro hac vice
PERKINS COIE LLP

Attorney for Defendant Google LLC

ORDER

The Court, having reviewed the Stipulation to Amend Briefing Schedule and Continue the Hearing Date on Defendant's Motion to Dismiss Plaintiff's First Amended Complaint, and good cause appearing, HEREBY ORDERS:

1.   Plaintiff's opposition brief to Defendant's motion to dismiss the amended complaint shall be due on or before January 9, 2024;

2.   Defendant's reply brief in support of the motion to dismiss shall be due on or before February 8, 2024;

3.   The noticed January 18, 2024 hearing date is vacated;

4.   Defendant's Motion to Dismiss Plaintiff's First Amended Complaint [Dkt. No. 60] is set for an in-person hearing on March 14, 2023 at 1:30 p.m. in Courtroom 10 before District Judge Daniel J. Calabretta.

IT IS SO ORDERED.

Dated: November 27, 2023   /s/ Daniel J. Calabretta
                                                                        THE HONORABLE DANIEL J. CALABRETTA
                                                                        UNITED STATES DISTRICT JUDGE

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