

1 DAVID H. KRAMER, State Bar No. 168452
 MICHAEL H. RUBIN, State Bar No. 214636
 2 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 3 650 Page Mill Road
 Palo Alto, CA 94304-1050
 4 Telephone: (650) 493-9300
 Facsimile: (650) 565-5100
 5 Email: mrubin@wsgr.com

6 TONIA OUELLETTE KLAUSNER
 BRIAN M. WILLEN
 7 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 8 1301 Avenue of the Americas
 40th Floor
 9 New York, NY 10019
 Telephone: (212) 999-5800
 10 Facsimile: (212) 999-5899

11 *Attorneys for Defendant Google Inc.*
 [Additional Counsel Listed on Signature Page]

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION

16 IN RE: GOOGLE ANDROID CONSUMER)
 PRIVACY LITIGATION)

Case No. 11-MD-02264 JSW

17) **STIPULATION AND ~~PROPOSED~~**
 18) **ORDER EXTENDING TIME TO**
 19) **FILE PROPOSED STIPULATED**
 20) **PROTECTIVE ORDER**

21 TROY YUNCKER, individually and on behalf of)
 all others similarly situated,)

Case No. 11-CV-03113 JSW

22 Plaintiff,)

23 v.)

24 PANDORA MEDIA, INC.,)

25 Defendant.)
 26)
 27)
 28)

1 Pursuant to Northern District of California Civil Local Rule 6-2, Defendants Google Inc.
2 and Pandora Media, Inc. and all Plaintiffs jointly submit the following Stipulation extending the
3 deadline to submit to the Court a proposed Stipulated Protective Order pursuant to the Court's
4 Civil Minute Order issued on September 26, 2011. All parties believe that additional time would be
5 helpful in order to jointly work through the Protective Order provisions most appropriate for this
6 complex consolidated proceeding. This is the parties' first request for an extension of time and, if
7 approved, the extension will not otherwise affect the schedule for this case nor delay the timely
8 resolution of this action.

9 1. The undersigned parties agree and stipulate that the deadline to submit to the Court
10 a proposed Stipulated Protective Order shall be October 21, 2011.

11
12 Respectfully submitted,

13 DATE: October 6, 2011

/s/ Michael H. Rubin
David H. Kramer
Michael H. Rubin
WILSON SONSINI GOODRICH & ROSATI
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: dkramer@wsgr.com
Email: mrubin@wsgr.com

Tonia Ouellette Klausner
Brian M. Willen
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas
40th Floor
New York, NY 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: tklausner@wsgr.com
Email: bwillen@wsgr.com

Attorneys for Defendant Google Inc.

14
15
16
17
18
19
20
21
22
23
24
25 DATE: October 6, 2011

/s/ Jonas Palmer Mann
William M. Audet
Jonas Palmer Mann
Joshua Caleb Ezrin
AUDET & PARTNERS LLP
221 Main Street

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Suite 1460
San Francisco, CA 94105
Telephone: (415) 982-1776
Facsimile: (415) 568-2556
Email: waudet@audetlaw.com
Email: jmann@audetlaw.com
Email: jezrin@audetlaw.com

Robert K. Shelquist
LOCKRIDGE GRINDAL NAUEN PLLP
Executive Committee Member
100 Washington Avenue South
Suite 2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
Email: rkshelquist@locklaw.com

Joseph H. Malley
LAW OFFICE OF JOSEPH H. MALLEY, PC
1045 North Zang Boulevard
Dallas, TX 75208
Telephone: (214) 943-6100
Facsimile: N/A
Email: malleylaw@gmail.com

***Attorneys for Plaintiffs Beverly Levine,
Phillip Hall, Erin Hillman, and Theodore
Spradley***

Suzanne L. Havens Beckman
David Christopher Parisi
Azita Moradmand
PARISI & HAVENS LLP
15233 Valleyheart Drive
Sherman Oaks, CA 91403
Telephone: (818) 990-1299
Facsimile: (818) 501-7852
Email: shavens@parisihavens.com
Email: dcparisi@parisihavens.com
Email: amoradmand@parisihavens.com

Avi Melech Kreitenberg
KAMBERLAW, LLP
1180 South Beverly Drive
Suite 601
Los Angeles, CA 90035
Telephone: (310) 400-1052
Facsimile: (310) 400-1056
Email: akreitenberg@kamberlaw.com

Scott A. Kamber
David A. Stampley
KAMBERLAW, LLC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

100 Wall Street
23rd Floor
New York, NY 10005-3704
Telephone: (212) 920-3072
Facsimile: (212) 290-3081
Email: skamber@kamberlaw.com
Email: dstampley@kamberlaw.com

Attorneys for Plaintiff Juliann King

Sara Dawn Avila
Gillian Leigh Wade
MILSTEIN ADELMAN, LLP
2800 Donald Douglas Loop North
Santa Monica, CA 90405
Telephone: (310) 396-9600
Facsimile: (310) 396-9635
Email: savila@milsteinadelman.com
Email: gwade@milsteinadelman.com

Howard W. Rubenstein
Richard A. Proaps
THE LAW OFFICES OF HOWARD W.
RUBENSTEIN
P.O. Box 4839
Aspen, CO 81612
Telephone: (832) 715-2788
Facsimile: (516) 688-0630
Email: howardr@pdq.net
Email: rproaps@aol.com

Attorneys for Plaintiff Tracev Lipton

Salim Khawaja
LAW OFFICE OF SALIM KHAWAJA
1010 Second Avenue
Suite 1750
San Diego, CA 92101
Telephone: (619) 685-5300
Facsimile: (619) 685-5344
Email: salimklaw@hotmail.com

Nabil Majed Nachawati, II
FEARS NACHAWATI LAW FIRM
4925 Greenville Avenue
Suite 715
Dallas, TX 75206
Telephone: (214) 890-0711
Facsimile: (214) 890-0712
Email: mn@fnlawfirm.com

Jeremy Reade Wilson
WILSON TROSCLAIR & LOVINS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

302 North Market Street
Suite 501
Dallas, TX 75202
Telephone: (214) 430-1930
Facsimile: (214) 276-1475
Email: jeremy@wtfirm.com

Attorneys for Maritsa Urias and Stan Hines

Donald Amamgbo
AMAMGBO & ASSOCIATES
6167 Bristol Parkway, #325
Culver City, CA 90230
Telephone: (310) 337-1137
Facsimile: (310) 337-1157
Email: donald@amamgbolaw.com

Reginald Terrell
THE TERRELL LAW GROUP
Post Office Box 13315, PMB #148
Oakland, CA 94661
Telephone: (510) 237-9700
Facsimile: (510) 237-4616
Email: reggiet2@aol.com

Attorneys for Plaintiff Kendrick Cochran

Steven T. Budaj
Donald J. Andrews, II
Paul M. Hughes
STEVEN T. BUDAJ, P.C.
65 Cadillac Square
Suite 2915
Detroit, MI 48226
Telephone: (313) 964-6465
Facsimile: (313) 447-2889
Email: stbudaj@counsel.cc
Email: j.andrews2@excite.com
Email: paul@attorneyhughes.com

Attorneys for Plaintiffs Julie Brown and Kayla Molaski

Aaron C. Mayer
MAYER LAW GROUP
18 Carolina Street
Suite B
Charleston, SC 29403
Telephone: (843) 376-4929
Facsimile: (888) 446-3963
Email: aaron@maverlawgroup.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Jon Pessano, Nicholas Lawrence and Sid Laizer
Brian W. Smith
SMITH & VANTURE, LLP
1615 Forum Place
Suite 4C
West Palm Beach, FL 33401
Telephone: (561) 684-6330
Facsimile: (561) 688-0630
Email: bws@smithvantage.com

Howard W. Rubinstein
THE LAW OFFICES OF
HOWARD W. RUBINSTEIN
P.O. Box 4839
Aspen, CO 81612
Telephone: (832) 715-2788
Facsimile: (561) 688-0630
Email: howardr@pdq.net

Attorneys for Plaintiffs James and Jessica Jefferys

E. Kirk Wood
WOOD LAW FIRM, LLC
P.O. Box 382434
Birmingham, AL 35238-2434
Telephone: (205) 612-0243
Facsimile: (866) 747-3905
Email: ekirkwood1@bellsouth.net

Joe R. Whatley, Jr.
Whatley, Drake, & Kallas
2001 Park Place North
Suite 1000
Birmingham, AL 35203
Telephone: (205) 328-9576
Facsimile: (205) 328-9669
Email: hwhatley@wdklaw.com

Attorneys for Plaintiffs Joan Smith and Bryan Hicks

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATE: October 6, 2011

/s/ Betsy C. Manifold
Francis M. Gregorek
Betsy C. Manifold
Rachele R. Rickert
Patrick H. Moran
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
750 B Street
Suite 2770
San Diego, California 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599
Email: gregorek@whafh.com
Email: manifold@whafh.com
Email: rickert@whafh.com
Email: moran@whafh.com

Liaison Counsel for Troy Yuncker and the Putative Yuncker Class

Joseph J. Siprut (*Pro Hac Vice*)
SIPRUT PC
122 South Michigan Avenue
Suite 1850
Chicago, IL 60603
Telephone: (312) 588-1440
Facsimile: (312) 427-1850
Email: jsiprut@siprut.com

Attorneys for Troy Yuncker and the Putative Yuncker Class

DATE: October 6, 2011

/s/ Tyler G. Newby
Laurence F. Pulgram
Tyler G. Newby
Sebastian E. Kaplan
FENWICK & WEST LLP
555 California Street
Suite 1200
San Francisco, CA 94104
Telephone: (415) 875-2300
Facsimile: (415) 281-1350
Email: lpulgram@fenwick.com
Email: tnewby@fenwick.com
Email: skaplan@fenwick.com

Attorneys for Defendant Pandora Media, Inc.

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2

3 SIGNED this 11 day of October, 2011.

4

5



JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28