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9 Attorneys for Applicant  
 10 ACTION AND PROTECTION FOUNDATION  
 AND DÁNIEL BODNÁR

11 **THE UNITED STATES DISTRICT COURT**  
 12 **IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 In the Matter of the Application of  
 15 ACTION AND PROTECTION  
 16 FOUNDATION; DÁNIEL BODNÁR  
 17 For an Order to Conduct Discovery for Use in a  
 18 Foreign Legal Proceeding pursuant to 28  
 U.S.C. § 1782.

Case No.: C 14-80076 EMC (LB)

**ACTION AND PROTECTION  
 FOUNDATION AND DANIEL  
 BODNAR'S STATUS CONFERENCE  
 STATEMENT** : ORDER

Date: March 27, 2014  
 Time: 11:00 a.m.  
 Place: Courtroom C – 15<sup>th</sup> Floor  
 Judge: Mag. Judge Laurel Beeler

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1 ACTION AND PROTECTION FOUNDATION and DÁNIEL BODNÁR (“Applicants”)  
2 respectfully submit the following status conference statement in advance of the March 27, 2014  
3 status conference concerning the Ex Parte Application for an Order Under 28 U.S.C. § 1782 for  
4 Issuance of Subpoenas to Bela Varga and Cloudflare Inc. for Taking of Depositions and  
5 Production of Documents for Use In a Foreign Proceeding and Criminal Investigations (the  
6 “Application”).

7 Applicants take no issue with the Court’s suggestion that Cloudflare Inc. and Bela Varga  
8 (collectively, the “Non-parties”) be served. In furtherance of the Court’s suggestion, Applicants  
9 propose the following:

10 Applicants shall endeavor to complete service on the Non-parties by April 1, 2014 and  
11 shall file a proof of service when service has been accomplished. Assuming service is  
12 accomplished by April 1, 2014, Applicants propose the following schedule for the Application:

13 Opposition brief (if any): filed on or before April 15, 2014;

14 Reply brief (if any): filed on or before April 22, 2014;

15 Hearing on application (if any): April 28, 2014 (or other date thereabout convenient to  
16 the Court).

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18 Respectfully submitted,

19 FOX ROTHSCHILD LLP

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21 Dated: March 25, 2014

/s/ Jack Praetzellis

JACK PRAETZELLIS

Attorneys for Attorneys for Applicant

ACTION AND PROTECTION

FOUNDATION AND DÁNIEL BODNÁR

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24 The court adopts the briefing schedule. Motion Hearing for Application set for May 8, 2014  
25 at 9:30 a.m. Motion Hearing set for March 27, 2014 at 11:00 a.m. is VACATED.  
26 Dated: March 26, 2014

