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Attorneys for Defendants
DIRECTV and DIRECTV, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FEDERAL TRADE COMMISSION,
Plaintiff,

v.

DIRECTV, a corporation,
and
DIRECTV, LLC, a limited liability
company,
Defendants.

Case No. 3:15-cv-01129 HSG

Assigned to the Hon. Haywood S. Gilliam, Jr.

**JOINT STIPULATION TO EXTEND TIME
FOR REBUTTAL REPORT**

1 Plaintiff Federal Trade Commission (“FTC”) and Defendants DIRECTV and DIRECTV,
2 LLC (DIRECTV) jointly stipulate, pursuant to Civil Local Rules 6-1(b), 6-2 and 7-12, to extend the
3 time for DIRECTV to serve its rebuttal report to the expert report of Tulin Erdem.

4 Due to scheduling issues, DIRECTV is taking the deposition of Ms. Erdem on November 4,
5 2016, which is after the currently-scheduled October 21 deadline for DIRECTV to serve its rebuttal
6 report. The parties have conferred with each other and Ms. Erdem about scheduling and have
7 arrived at an agreement satisfactory to all, which includes extending DIRECTV’s time to serve a
8 rebuttal report to November 7 and the FTC’s time to serve a reply report to November 28. The
9 proposed modification to the schedule would have no effect on any other deadlines in this case (i.e.,
10 all other rebuttal report deadlines remain the same, all other reply report deadlines remain the same,
11 and the expert discovery cut-off date remains the same).

12 There have been the following modifications to the schedule in this case: (a) Dkt. No. 23,
13 April 17, 2015 (granting stipulated request for an extension of time for the FTC to file motion to
14 strike Defendants’ affirmative defenses); (b) Dkt. No. 64, October 21, 2015 (granting motion for
15 extension of time for the FTC to respond to DIRECTV’s motion for partial summary judgment); (c)
16 Dkt. No. 87, December 9, 2015 (granting joint stipulation to extend DIRECTV’s time to file its reply
17 brief in support of its motion for partial summary judgment, and continuing hearing date on motion
18 for partial summary judgment); (d) Dkt. No. 99, February 4, 2016 (granting stipulation continuing
19 hearing date on motion for partial summary judgment); (e) Dkt. No. 105 (granting stipulation
20 continuing Case Management Conference); (f) Dkt. No. 138, April 12, 2016 (granting stipulation to
21 extend case deadlines, including fact and expert discovery, summary judgment briefing deadlines
22 and hearing date, and trial date); (g) Dkt. No. 159, July 19, 2016 (granting stipulation to extend case
23 deadlines, including fact and expert discovery); (h) Dkt. 181, September 26, 2016 (granting motion
24 to extend time to file declaration in support of motion to file under seal); and (i) September 28, 2016
25 (granting stipulation to extend time for rebuttal and reply expert reports and expert discovery).

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1 NOW THEREFORE, the parties, through the undersigned counsel, hereby stipulate to and
2 respectfully request the court enter the following schedule:

3

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
4 Rebuttal Report to Erdem Report	October 21, 2016	November 7
5 Reply Report	November 14, 2016	November 28, 2016
6 Expert Discovery Close	December 2, 2016	December 2, 2016

7

8 Dated: October 20, 2016

SIDLEY AUSTIN LLP

9 By: /s/ Chad S. Hummel
10 Chad S. Hummel
11 Attorneys for Defendants
DIRECTV and DIRECTV, LLC

12 FEDERAL TRADE COMMISSION

13 By: /s/ Eric D. Edmondson
14 Eric D. Edmondson
15 Attorneys for Plaintiff
Federal Trade Commission

16 Pursuant to Civil Local Rule 5-1(i), the filer attests that concurrence in the filing of this
17 document has been obtained from the signatories above.

18 By: /s/ Chad S. Hummel

19
20 **ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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24 Dated: October 24, 2016


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28 HON. HAYWOOD S. GILLIAM, JR.