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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 EXPERT DISCOVERY**

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 the parties to complete expert discovery.

4 Due to scheduling issues, the parties are unable to complete all expert witness depositions by
5 the December 2, 2016 deadline for expert discovery. The parties have conferred with each other
6 about the scheduling of the remaining expert witness depositions and have arrived at an agreement
7 satisfactory to all which includes extending the close of expert discovery to December 23, 2016.
8 The proposed modification to the schedule would have no effect on any other deadlines in this case.

9 There have been the following modifications to the schedule in this case: (a) Dkt. No. 23,
10 April 17, 2015 (granting stipulated request for an extension of time for the FTC to file motion to
11 strike Defendants’ affirmative defenses); (b) Dkt. No. 64, October 21, 2015 (granting motion for
12 extension of time for the FTC to respond to DIRECTV’s motion for partial summary judgment); (c)
13 Dkt. No. 87, December 9, 2015 (granting joint stipulation to extend DIRECTV’s time to file its reply
14 brief in support of its motion for partial summary judgment, and continuing hearing date on motion
15 for partial summary judgment); (d) Dkt. No. 99, February 4, 2016 (granting stipulation continuing
16 hearing date on motion for partial summary judgment); (e) Dkt. No. 105 (granting stipulation
17 continuing Case Management Conference); (f) Dkt. No. 138, April 12, 2016 (granting stipulation to
18 extend case deadlines, including fact and expert discovery, summary judgment briefing deadlines
19 and hearing date, and trial date); (g) Dkt. No. 159, July 19, 2016 (granting stipulation to extend case
20 deadlines, including fact and expert discovery); (h) Dkt. 181, September 26, 2016 (granting motion
21 to extend time to file declaration in support of motion to file under seal); (i) Dkt. No. 185, September
22 28, 2016 (granting stipulation to extend time for rebuttal and reply expert reports and expert
23 discovery); (j) Dkt. No. 200, October 24, 2016 (granting motion to extend time for DIRECTV to
24 serve its rebuttal report to the expert report of Tulin Erdem); and (k) Dkt. No. 210, November 22,
25 2016 (granting motion to extend time to file declaration in support of motion to file under seal).

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

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Expert Discovery Close	December 2, 2016	December 23, 2016

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Dated: November 30, 2016

SIDLEY AUSTIN

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

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FEDERAL TRADE COMMISSION

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

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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.

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By: /s/ Chad S. Hummel

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ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated: December 1, 2016


HON. HAYWOOD S. GILLIAM, JR.

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