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11 TWITTER, Inc.

12 UNITED STATES DISTRICT COURT  
13  
14 NORTHERN DISTRICT OF CALIFORNIA  
15  
16 SAN FRANCISCO DIVISION  
17

18 WILFORD RANEY, as an individual, and on  
19 behalf of the others similarly situated,

20 Plaintiff,

21 v.

22 TWITTER, INC., a Delaware corporation,

23 Defendant.

Case No. 3:15-cv-04191-WHA

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
TO EXTEND TIME TO RESPOND TO  
FIRST AMENDED CLASS ACTION  
COMPLAINT AND SET BRIEFING  
SCHEDULE FOR MOTION TO STAY (CIVIL  
L.R. 6-1(A), (B); 6-2)**

Judge: Hon. William H. Alsup  
Date: Not yet set

1 Pursuant to Civil Local Rules 6-1(a), 6-1(b), and 6-2, plaintiff Wilford Raney (“Plaintiff”)  
2 and defendant Twitter, Inc. (“Twitter”) (collectively “the Parties”), by and through their  
3 respective counsel, stipulate and agree as follows:

4 WHEREAS, Plaintiff filed a putative class action lawsuit against Twitter on or about  
5 September 14, 2015;

6 WHEREAS, Plaintiff filed his First Amended Class Action Complaint (“FAC”) on  
7 September 30, 2015;

8 WHEREAS, Twitter’s deadline to respond to the Complaint is October 19, 2015;

9 WHEREAS, under Civil Local Rule 6-1(a), the Parties may stipulate in writing, without a  
10 Court order, to extend the time within which to answer or otherwise respond to the Complaint,  
11 provided the change will not alter any deadline already fixed by Court order;

12 WHEREAS, under Civil Local Rule 6-1(b), a Court order is required for any enlargement  
13 of time that alters a deadline that involves papers required to be filed with the Court (other than  
14 an initial response to the complaint);

15 WHEREAS, the parties may file a stipulation requesting an order that would extend time  
16 frames set in the Federal Rules, accompanied by a declaration complying with Civil Local Rule  
17 6-2, and such a declaration is filed herewith;

18 WHEREAS, the Parties have agreed to stipulate under Civil Local Rule 6-1(a) and (b) to a  
19 filing and briefing schedule for Twitter’s response to the FAC as set forth below;

20 WHEREAS, the Parties have stipulated under Civil Local Rule 6-1(b) to a filing and  
21 briefing schedule for Twitter’s anticipated motion to stay this action (“Motion to Stay”) as set  
22 forth below;

23 WHEREAS, extending the deadline for any subsequent briefing necessitated by Twitter’s  
24 response to the Complaint and Motion to Stay, as set forth below, will allow for a more complete  
25 and orderly presentation of the complex legal issues the Court will need to resolve in both  
26 motions (*see* Declaration of Whitty Somvichian (“Somvichian Decl.”) ¶ 3, filed concurrently  
27 herewith);

28 WHEREAS, extending the deadlines for any subsequent briefing necessitated by Twitter’s

1 response to the Complaint or Motion to Stay will help accommodate attorneys' schedules  
2 for the upcoming holidays.

3 WHEREAS, no prior time modifications have been sought in this case (*id.* ¶ 6);

4 WHEREAS, this modification would not affect the case schedule as none has been  
5 entered (*id.* ¶ 7).

6 NOW THEREFORE, the Parties hereby stipulate and agree to extend the following  
7 deadlines:

- 8 1. November 9, 2015: Twitter's deadline to respond to the FAC and file its  
9 anticipated Motion to Stay;
- 10 2. December 9, 2015: Plaintiff's Oppositions due;
- 11 3. January 9, 2015: Twitter's Replies due.

12  
13 **IT IS SO STIPULATED.**

14 Dated: October 8, 2015

COOLEY LLP

16 s/ Whitty Somvichian

Whitty Somvichian (194463)  
Attorneys for Defendant Twitter, Inc.

18 Dated: October 8, 2015

EDELSON PC

20 s/ Alexander T.H. Nguyen


Alexander T.H. Nguyen  
Attorneys for Plaintiff

22 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3)) regarding signatures, Whitty  
23 Somvichian hereby attests that concurrence in the filing of this document has been obtained.*

24 **PROPOSED ORDER**

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

26 DATED: October 13, 2015.

27   
The Honorable William H. Alsup  
28 United States District Judge