

1 Todd Logan (SBN – 305912)  
 2 tlogan@edelson.com  
 Samuel Lasser (SBN - 252754)  
 3 slasser@edelson.com  
 Rafey S. Balabanian (Admitted *Pro Hac Vice*)  
 4 rbalabanian@edelson.com  
 EDELSON PC  
 5 329 Bryant Stret  
 San Francisco, California 94107  
 6 Tel: 415.994.9930  
 7 Fax: 415.776.8047

8 Alexander T.H. Nguyen (Admitted *Pro Hac Vice*)  
 anguyen@edelson.com  
 9 Amir C. Missaghi (Admitted *Pro Hac Vice*)  
 amissaghi@edelson.com  
 10 EDELSON PC  
 11 350 North LaSalle Street, 13th Floor  
 Chicago, Illinois 60654  
 12 Tel: 312.589.6370  
 13 Fax: 312.589.6378

14 *Attorneys for Plaintiff and the Putative Classes*

15 **IN THE UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**  
 17 **SAN FRANCISCO DIVISION**

18 WILFORD RANEY, individually and on  
 19 behalf of all 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 EXTENDING TIME TO FILE  
 PLAINTIFF’S REPLY TO  
 DEFENDANT’S OPPOSITION TO  
 MOTION FOR A PRELIMINARY  
 INJUNCTION**

Judge: Hon. William H. Alsup

1 WHEREAS, Plaintiff Wilford Raney (“Plaintiff” or “Raney”) and Defendant Twitter,  
2 Inc. (“Defendant” or “Twitter”) respectfully submit this stipulation;

3 WHEREAS, on December 9, 2015, Twitter filed an Opposition to Plaintiff’s Motion For  
4 A Preliminary Injunction (Dkt. 39);

5 WHEREAS, it is Plaintiff’s position that Twitter’s Opposition attaches Declarations from  
6 four Twitter employees, each attesting to facts relevant to Twitter’s Opposition;

7 WHEREAS, it is Plaintiff’s position that Plaintiff needs an opportunity to assess the  
8 veracity (via limited expedited discovery) of those attestations in order to prepare his Reply  
9 brief;

10 WHEREAS, the Parties met and conferred more than five times (and exchanged dozens  
11 of emails) between December 15, 2015 and December 23, 2015 to discuss Plaintiff’s position  
12 that he needs limited expedited discovery;

13 WHEREAS, the Parties have agreed that Plaintiff may conduct a three-hour Rule  
14 30(b)(6) deposition of a Twitter representative on January 6, 2016, limited specifically to  
15 subjects and argument raised in Twitter’s Opposition Brief and the attached Declarations, and  
16 Defendant has agreed to produce limited discovery, including non-custodial, overview  
17 documents and written interrogatory responses around January 5, 2016;

18 WHEREAS, pursuant to a stipulation by the Parties (Dkt. 26) and an order of this Court  
19 (Dkt. 27), the deadline for Plaintiff to file his reply in support of his motion for preliminary  
20 injunction is January 9, 2016;

21 WHEREAS, it is Plaintiff’s position that Plaintiff could not by January 9, 2016  
22 reasonably incorporate into his reply brief any information gained from the upcoming Rule  
23 30(b)(6) deposition;

24 WHEREAS, the Parties have agreed that Plaintiff will seek, and Twitter will not oppose,  
25 an extension of time, up to and including January 15, 2016, for Plaintiff to file his reply in  
26 support of his motion for preliminary injunction;



By: /s/ Kyle C. Wong  
One of Defendant's Attorneys

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

DATED: December 29, 2015.

  
THE HONORABLE WILLIAM H. ALSUP  
United States District Judge

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: December 28, 2015

/s/ Todd Logan