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Attorneys for Plaintiff

Attorneys for Plaintiff, JAMES SWEET; CHUCK MERE; ZOMBIE GO BOOM, LLC, DBA ZOMBIEGOBOOM

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

JAMES SWEET; CHUCK MERE;
ZOMBIE GO BOOM, LLC, DBA
ZOMBIEGOBOOM,

Plaintiff,

vs.

GOOGLE, INC. DBA YOUTUBE,

Defendant.

Case No. 3:17-cv-03953-EMC

[Hon. Edward M. Chen]

**STIPULATION CONTINUING
PLAINTIFF'S DEADLINE TO FILE A
FIRST AMENDED COMPLAINT**

Complaint Filed: July 13, 2017
Current Motion Hearing Date:
November 9, 2017
New Date: TBD

1 Plaintiff, JAMES SWEET; CHUCK MERE; ZOMBIE GO BOOM, LLC,
2 DBA ZOMBIEGOBOOM, (“Plaintiff”), and Defendant, GOOGLE, INC.
3 (“Defendant”), hereby agree and stipulate as follows:

4 WHEREAS, on July 13, 2017, Plaintiff filed a purported Class Action
5 Complaint (the “Complaint”) against Defendant, and served the Complaint on
6 Defendant on or about August 4, 2017;

7 WHEREAS, on August 14, 2017, the parties entered in a stipulation
8 extending Defendant’s deadline to respond to the complaint to September 25,
9 2017;

10 WHEREAS, Defendant filed, on September 25, 2017, a motion to dismiss
11 Plaintiff’s complaint;

12 WHEREAS, Pursuant to Northern District of California Local Rule 7-3(a),
13 Plaintiff’s deadline to file an opposition to Defendant’s motion to dismiss is
14 October 9, 2017, only 14 days after Defendant’s filing of their motion to dismiss;

15 WHEREAS, Plaintiff plans to file a first amended complaint to address the
16 deficiencies addressed in Defendant’s motion to dismiss the complaint, the parties
17 wish to continue plaintiff’s deadline to file their opposition to Defendant’s motion
18 to dismiss the complaint, to allow time to file a first amended complaint and to
19 research and respond adequately to Defendant’s issues raised in their motion to
20 dismiss;

21 WHEREAS, the parties have agreed to extend the deadline to October 26,
22 2017 for Plaintiff to file a first amended complaint;

23 WHEREAS, the parties have agreed to extend the deadline to November 30,
24 2017 for Defendant to respond to the first amended complaint;

25 WHEREAS, the parties have agreed that Plaintiff will submit any
26 oppositions to Defendant’s responsive pleadings under Northern District of
27 California Local Rule 7-3(a); and

1 Whereas; the parties will request this Honorable Court to vacate the
2 November 9, 2017 hearing date for Defendant's Motion to Dismiss the Complaint;
3 and

4 WHEREAS, the parties request that the case management conference
5 currently scheduled for December 21, 2017 be continued to February 22, 2018;

6 Thus, it is hereby stipulated that:

- 7 1. Plaintiff's deadline to file the first amended complaint is continued to
8 October 26, 2017, Defendant's deadline to submit responsive pleadings
9 is continued to November 30, 2017, and Plaintiff's deadline to submit
10 an opposition to Plaintiff's responsive pleadings is continued, pursuant
11 to Northern District of California Local Rule 7-3(a), based on the date
12 Defendant's response is filed; and
- 13 2. The November 9, 2017 hearing date for Defendant's Motion to Dismiss
14 the Complaint is vacated; and
- 15 3. The case management conference currently scheduled for December 21,
16 2018 is continued to ~~February 22, 2018.~~ March 1, 2018 at 9:30 a.m.

17
18 Dated: October 6, 2017

Law Offices of Todd M. Friedman, P.C.

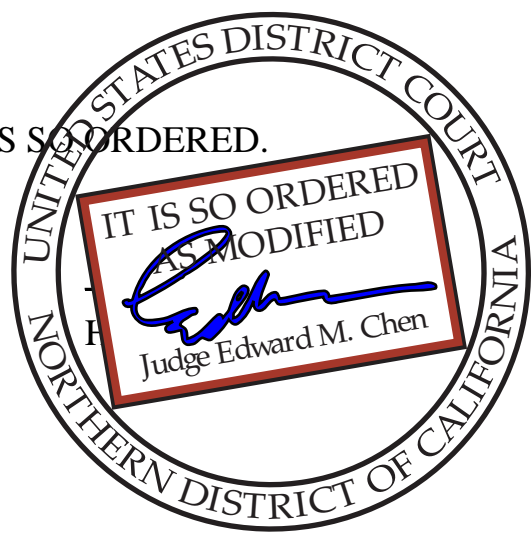
19 By: /s/ Todd M. Friedman
20 Todd M. Friedman, Esq.
21 Adrian R. Bacon, Esq.
22 Attorneys for Plaintiff

23
24 Dated: October 6, 2017 WILSON SONSINI GOODRICH & ROSATI, P.C.

25 By: /s/ Maura L. Rees
26 Maura L. Rees
27 Attorneys for Defendant

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PURSUANT TO STIPULATION, IT IS SO ORDERED.



1 Signature Certification

2
3 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
4 Policies and Procedures Manual, I hereby certify that the content of this document
5 is acceptable to Maura L. Rees, and that I have Ms. Rees's authorization to affix her
6 electronic signature to this document.

7 Dated: October 6, 2017

Law Offices of Todd M. Friedman, P.C.

8
9 By: /s/ Todd M. Friedman
10 Todd M. Friedman, Esq.
11 Adrian R. Bacon, Esq.
12 Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

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Filed electronically on October 6, 2017, with:

United States District Court CM/ECF system

Notification sent electronically on October 6, 2017, to:

Honorable Judge Edward M. Chen
United States District Court
Northern District of California, San Francisco Division

And to all counsel of record

s/Todd M. Friedman
Todd M. Friedman, Esq.