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*Attorneys for Defendants*

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN FRANCISCO DIVISION

11 REARDEN LLC and REARDEN MOVA  
 12 LLC,

13 Plaintiffs,

14 vs.

15 THE WALT DISNEY COMPANY, WALT  
 16 DISNEY MOTION PICTURES GROUP,  
 17 INC., BUENA VISTA HOME  
 ENTERTAINMENT, INC., MARVEL  
 18 STUDIOS, LLC, and MANDEVILLE  
 FILMS, INC.,

19 Defendants.

20 REARDEN LLC and REARDEN MOVA  
 21 LLC,

22 Plaintiffs,

23 vs.

24 TWENTIETH CENTURY FOX FILM  
 25 CORPORATION and TWENTIETH  
 CENTURY FOX HOME  
 ENTERTAINMENT LLC,

26 Defendants.

Case Nos. 3:17-cv-04006-JST  
 3:17-cv-04191-JST  
 3:17-cv-04192-JST

**STIPULATION AND [PROPOSED]  
 ORDER RE: BRIEFING SCHEDULE ON  
 MOTION FOR SUMMARY JUDGMENT  
 ON CAUSAL NEXUS ISSUE**

Judge: Hon. Jon S. Tigar

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REARDEN LLC and REARDEN MOVA  
LLC,

Plaintiffs,

vs.

PARAMOUNT PICTURES  
CORPORATION and PARAMOUNT  
HOME ENTERTAINMENT  
DISTRIBUTION INC.

Defendants.

1 WHEREAS, the Studio Defendants requested leave to file an early summary judgment  
2 motion on the issue whether Plaintiffs can establish the causal nexus for a claim of “indirect  
3 profits” under the Copyright Act (Dkt. 127, No. 17-cv-04006; Dkt. 93, No. 17-cv-04191; Dkt. 93,  
4 No. 17-cv-04192).

5 WHEREAS, the Court granted the Studio Defendants’ request to file a summary judgment  
6 motion on the causal nexus issue and set a briefing schedule (Dkt. 128, No. 17-cv-04006; Dkt. 94,  
7 No. 17-cv-04191; Dkt. 94, No. 17-cv-04192).

8 WHEREAS, the Studio Defendants have requested, and Plaintiffs have agreed, that the  
9 Studio Defendants may have an additional two weeks to file their moving papers, and that the  
10 other dates in the Court-ordered briefing schedule should likewise be adjusted by two weeks.

11 THE PARTIES THEREFORE STIPULATE:

12 [1] The schedule for the Studio Defendants’ summary judgment motion on the causal  
13 nexus issue shall be continued by two weeks, as follows:

Defendants file motion for summary judgment on causal nexus issue	February 28, 2019
Plaintiffs email a letter to Defendants identifying the discovery Plaintiffs contend they need to oppose the motion	March 7, 2019
Deadline for parties to complete meet-and-confer on Plaintiffs’ discovery requests relating to motion	March 21, 2019
Parties file either:  a. Stipulation and proposed order with schedule (i) for completing agreed-upon discovery relating to motion and (ii) filing opposition and reply briefs on motion  or  b. Simultaneous letter briefs (each not to exceed five single-spaced pages) setting forth their respective positions on discovery requests and schedule for finishing discovery and briefing on motion	April 4, 2019

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1 [2] Should the parties submit simultaneous letter briefs as set forth above, they shall  
2 submit a separate, jointly prepared summary of their meet-and-confer efforts. The first draft of  
3 such summary shall be prepared by Defendants and shall be served (but not filed) by March 29,  
4 2019. Any proposed revisions shall be served by Plaintiffs by April 2, 2019. Defendants shall file  
5 the final version of the summary on April 4, 2019.

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7 DATED: January 30, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

8 By:           /s/ Mark S. Carlson<sup>1</sup>  
9 MARK S. CARLSON

10 *Attorneys for Plaintiffs*

11 DATED: January 30, 2019

MUNGER, TOLLES & OLSON LLP

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13 By:           /s/ Kelly M. Klaus  
14 KELLY M. KLAUS

15 *Attorneys for Defendants*

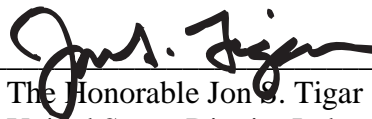
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28 <sup>1</sup> Signed electronically by Kelly M. Klaus with the concurrence of Mark S. Carlson, pursuant to  
L.R. 5-1(i)(3).

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**[PROPOSED] ORDER**

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

January 30, 2019



The Honorable Jon S. Tigar  
United States District Judge