1	KELLY M. KLAUS (SBN 161091)	STEVE W. BERMAN (pro hac vice)			
2	kelly.klaus@mto.com ROHIT K. SINGLA (SBN 213057)	steve@hbsslaw.com MARK S. CARLSON (pro hac vice)			
3	rohit.singla@mto.com ELIA HERRERA (SBN 293278)	markc@hbsslaw.com HAGENS BERMAN SOBOL SHAPIRO LLP			
4	elia.herrera@mto.com MUNGER, TOLLES & OLSON LLP	1918 Eighth Avenue, Suite 3300 Seattle, Washington 98101			
5	560 Mission Street, 27th Floor San Francisco, California 94105-2907	Telephone: (206) 623-7292 Facsimile: (206) 623-0594			
6	Telephone:     (415) 512-4000       Facsimile:     (415) 512-4077				
7	GLENN D. POMERANTZ (SBN 112503)	RIO S. PIERCE (SBN 298297)			
8	glenn.pomerantz@mto.com JOHN L. SCHWAB (SBN 301386)	riop@hbsslaw.com HAGENS BERMAN SOBOL SHAPIRO LLP 715 Haarst Avenue, Swite 202			
9	john.schwab@mto.com MUNGER, TOLLES & OLSON LLP 250 South Crond Assessor 50th Floor	715 Hearst Avenue, Suite 202 Berkeley, California 94710 Takaharat (510) 725 2000			
10	350 South Grand Avenue, 50th Floor Los Angeles, California 90071-3426	Telephone:     (510) 725-3000       Facsimile:     (510) 725-3001			
11	Telephone:     (213) 683-9100       Facsimile:     (213) 687-3702	Attorneys for Plaintiffs			
12	Attorneys for Defendants				
13					
14	UNITED STATES DISTRICT COURT				
15	NORTHERN DISTRICT OF CALIFORNIA				
16	SAN FRANCISCO DIVISION				
17	REARDEN LLC and REARDEN MOVA LLC,	Case Nos. 3:17-cv-04006-JST 3:17-cv-04191-JST			
18	Plaintiffs,	3:17-cv-04192-JST			
19	VS.	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING			
20	VS. THE WALT DISNEY COMPANY, WALT	PLAINTIFFS' FILING OF FIRST			
21	DISNEY MOTION PICTURES GROUP, INC., BUENA VISTA HOME	AMENDED COMPLAINTS AND BRIEFING SCHEDULE ON MOTIONS			
22	ENTERTAINMENT, INC., MARVEL	TO DISMISS THE SAME			
23	STUDIOS, LLC, and MANDEVILLE FILMS, INC.,	Judge: Hon. Jon S. Tigar			
24	Defendants.				
25					
26					
27					
28					
	38072585.1				
		JOINT STIPULATION AND <del>[PROPOSED]</del> ORDER NOS. 17-CV-04006, 17-CV-04191, 17-CV-04192			
		NOS. 17-CV-04006, 17-CV-04191, 17-CV-04192 Dockets.Justia.dom			

1	REARDEN LLC and REARDEN MOVA LLC,	]	
2	Plaintiffs,		
3	vs.		
4	TWENTIETH CENTURY FOX FILM		
5	CORPORATION and TWENTIETH CENTURY FOX HOME		
6	ENTERTAINMENT LLC,		
7	Defendants.		
8	REARDEN LLC and REARDEN MOVA		
9	LLC,		
10	Plaintiffs,		
11	vs.		
12	PARAMOUNT PICTURES CORPORATION and PARAMOUNT		
13	HOME ENTERTAINMENT DISTRIBUTION INC.		
14			
15	Defendants.		
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
	38072585.1	<b>T</b>	
		J	OINT ST NOS.

1	STIPULATION			
2	Plaintiffs and Defendants in the above-captioned action, by and through their counsel of			
3	record, stipulate as follows:			
4	WHEREAS, on February 22, the Court granted Defendants' motions to dismiss Plaintiffs'			
5	original complaints in theabove-captioned cases in part, and dismissed certain claims without			
6	prejudice (No. 17-cv-04006, Dkt. 60);			
7	WHEREAS, Plaintiffs have provided Defendants with proposed amended complaints after			
8	the Court's decision;			
9	WHEREAS, Defendants do not object to the filing of the amended complaints, based on			
10	Plaintiffs' agreement and the Court's approval of a stipulated schedule on motions to dismiss the			
11	amended complaints that Defendants intend to file;			
12				
13	NOW THEREFORE, for good cause, the parties stipulate as follows:			
14	[1] Defendants do not oppose Plaintiffs' filing of the proposed First Amended			
15	Complaints in the above-captioned cases. The Parties agree that by entering this Stipulation,			
16	Defendants do not waive any objections to the amendments that may be asserted in motions to			
17	dismiss or other appropriate motions.			
18	[2] The Defendants in each case shall have 30 days from the date Plaintiffs file each			
19	First Amended Complaint to file motions to dismiss them.			
20	[3] Plaintiffs shall have 21 days from the date each such motion to dismiss is filed to			
21	file their opposition.			
22	[4] Defendants in each case shall have 21 days from the date the opposition brief is			
23	filed to file their reply.			
24	IT IS SO STIPULATED.			
25				
26				
27				
28				
	38072585.1   1   JOINT STIPULATION AND [PROPOSED] ORDER			
	NOS. 17-CV-04006, 17-CV-04191, 17-CV-04192			

1	DATED: March 6, 2018	HAGENS BERMAN SOBOL SHAPIRO LLP	
2			
3			
4		By: /s/ Steve Berman STEVE BERMAN	
5			
6		Attorneys for Plaintiffs	
7	DATED: March 6, 2018 MUNGER, TOLLES & OLSON LLP		
8		- · · · · · · · · · · · · · · · · · · ·	
9			
10		By: /s/ Kelly M Klaus	
11		KELLY M. KLAUS	
12	Attorneys for Defendants		
13			
14	<b>CIVIL LOCAL RULE 5-1 ATTESTATION</b>		
15	I, Steve Berman, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that Kelly M.		
16			
17	Klaus concurred in the filing of this document.		
18	Klads concurred in the ming of this document.		
19	/s/ Steve Berman Steve Berman		
20	Steve Berman		
21			
22	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
23			
24	DATED: <u>March 7</u> , 2018		
25			
26	The How rable Jon S. Tigar		
27		The Homphuole coll of Figur	
28	38072585.1		
		2 JOINT STIPULATION AND [PROPOSED]-ORDER NOS. 17-CV-04006, 17-CV-04191, 17-CV-04192	