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Attorneys for Plaintiff
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Attorneys for Defendant
 The Trustees of Princeton University

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UAB "PLANNER5D" d/b/a PLANNER 5D,
 Plaintiff,
 v.
 FACEBOOK INC.; FACEBOOK
 TECHNOLOGIES, LLC; THE TRUSTEES OF
 PRINCETON UNIVERSITY; et al.,
 Defendants.

Case No. 3:19-cv-03132-WHO
**STIPULATION AND ORDER RESETTING
 TIME FOR THE TRUSTEES OF
 PRINCETON UNIVERSITY TO FILE REPLY
 SUBMISSION IN SUPPORT OF ITS MOTION
 TO DISMISS THE COMPLAINTS**

This Document Relates To: All Actions
 Complaint filed: June 5, 2019
 First Amended Complaint filed: December 6, 2019

UAB "PLANNER5D" d/b/a PLANNER 5D,
 Plaintiff,
 v.
 FACEBOOK INC.; FACEBOOK
 TECHNOLOGIES, LLC; THE TRUSTEES OF
 PRINCETON UNIVERSITY; et al.,
 Defendants.

Case No. 3:20-cv-02198-WHO
 Complaint filed: March 31, 2020

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JOINT STIPULATION

Pursuant to Civil L.R. 6-2 and 7-12, it is hereby stipulated by and among Plaintiff UAB “Planner5D” d/b/a Planner 5D (“Planner 5D”) and Defendant The Trustees of Princeton University (“Princeton”), through their respective attorneys, that:

WHEREAS, Planner 5D instituted this action on June 5, 2019, alleging claims of copyright infringement (the “Copyright Claims”) and misappropriation of trade secrets (the “Trade Secrets Claims”) (Dkt. 1)¹;

WHEREAS, after the Court dismissed Planner 5D’s initial pleading, Planner 5D filed a First Amended Complaint on December 6, 2019, amending its pleading with regard to its Trade Secrets Claims (Dkt. 53);

WHEREAS, pursuant to a stipulation, the Court issued an Order on December 18, 2019, adjourning Princeton’s deadline to respond to the First Amended Complaint pending resolution of a procedural dispute regarding how this action should proceed (Dkt. 56);

WHEREAS, the Court resolved the aforementioned procedural dispute in an Order (the “Procedural Order”) issued on March 5, 2020 (Dkt. 59);

WHEREAS, pursuant to the Procedural Order, Planner 5D instituted a new action on March 31, 2020 (bearing the docket number 3:20-cv-02198) that reasserted its Copyright Claims (the “Copyright Complaint”) (3:20-cv-02198 Dkt. 1);

WHEREAS, pursuant to a stipulation, the Court issued an Order on April 6, 2020, adjourning Princeton’s deadline to respond to the First Amended Complaint and the Copyright Complaint until 21 days after the Court consolidated the two actions filed by Planner 5D; providing Planner 5D with 28 days to oppose any motion to dismiss filed by Princeton; and providing Princeton with 14 days to file a reply in support of any motion to dismiss (Dkt. 62);

WHEREAS, the Court issued an Order (the “Consolidation Order”) on April 8, 2020, consolidating the two actions filed by Planner 5D (Dkt. 64);

¹ Unless otherwise noted, all docket entries refer to the docket for the first action filed by Planner 5D, No. 3:19-cv-03132.

1 WHEREAS, Princeton moved to dismiss the First Amended Complaint and the Copyright
2 Complaint on April 29, 2020 (i.e., 21 days after the Consolidation Order) (Dkt. 68);

3 WHEREAS, Planner 5D opposed Princeton’s motion on May 27, 2020 (i.e., 28 days after Princeton
4 filed its motion) (Dkt. 76);

5 WHEREAS, Princeton’s reply submission in support of its motion is due on June 10, 2020 (i.e., 14
6 days after Planner 5D filed its opposition);

7 WHEREAS, Princeton noticed its motion for a hearing on July 9, 2020 (Dkt. 68);

8 WHEREAS, counsel for Princeton face logistical challenges in preparing Princeton’s reply
9 submission related to the ongoing coronavirus pandemic and the civic disruption currently affecting
10 municipalities across the country;

11 WHEREAS, counsel for Princeton and Planner 5D have met and conferred, and agree that as a
12 professional courtesy, and subject to the approval of this Court, counsel for Princeton may take an
13 additional seven (7) days (i.e., until June 17, 2020) to file Princeton’s reply submission; and

14 WHEREAS, the foregoing amendment to the briefing schedule will not affect any other scheduling
15 deadline set by the Court in this action.

16 NOW, THEREFORE IT IS STIPULATED AND AGREED THAT, subject to the approval of the
17 Court, Princeton’s time to file its reply submission in support of its motion to dismiss shall be reset to June
18 17, 2020.

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Dated: June 4, 2020

JENNER & BLOCK LLP

By: /s/ Andrew H. Bart
ANDREW H. BART (PRO HAC VICE)

Attorneys for Defendant
The Trustees of Princeton University

Dated: June 4, 2020

THE BUSINESS LITIGATION GROUP PC

By: /s/ Marc N. Bernstein
MARC N. BERNSTEIN (CAL. BAR NO. 145837)

Attorneys for Plaintiff
UAB "Planner5D" d/b/a Planner 5D

ORDER

PURUSANT TO STIPULATION AND FOR GOOD CAUSE SHOWN, IT IS ORDERED THAT:

1. The time by which Defendant The Trustees of Princeton University must file its reply submission in support of its motion to dismiss (Dkt. 68) shall be reset to June 17, 2020.

IT IS SO ORDERED.

Dated: June 5, 2020



The Honorable William H. Orrick
United States District Judge

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ATTESTATION

I, Andrew H. Bart, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Resetting the Time for The Trustees of Princeton University to File Its Reply Submission in Support of Its Motion to Dismiss the Complaints. In compliance with Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from all signatories.

Dated: June 4, 2020

By: /s/ Andrew H. Bart
Andrew H. Bart (pro hac vice)

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