

1 Rafey Balabanian (SBN 315962)
2 rbalabanian@edelson.com
3 Lily Hough (SBN 315277)
4 lhough@edelson.com
5 EDELSON PC
6 150 California Street, 18th Floor
7 San Francisco, California 94111
8 Tel: 415.212.9300
9 Fax: 415.373.9435

10 *Attorneys for Plaintiff and the Putative Class*

11 ANTHONY J WEIBELL (SBN 238850)
12 WILSON SONSINI GOODRICH & ROSATI
13 Professional Corporation
14 650 Page Mill Road
15 Palo Alto, CA 94304-1050
16 Telephone: (650) 493-9300
17 Facsimile: (650) 565-5100
18 Email: aweibell@wsgr.com

19 *Attorneys for Defendant*

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 JANE DOE,

24 Plaintiff,

25 v.

26 ROBLOX CORPORATION,

27 Defendant.

CASE NO.: 3:21-cv-03943-WHO

**STIPULATED REQUEST TO
EXTEND BRIEFING SCHEDULE
AND RESCHEDULE CASE
MANAGEMENT CONFERENCE;
[PROPOSED] ORDER**

28 In accordance with Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Jane Doe (“Plaintiff Doe” or “Plaintiff”) and Defendant Roblox Corporation (“Roblox”), by and through their respective counsel, respectfully request that this Court enter an Order (i) granting a brief seven (7) day extension of the deadlines for the parties to respond/reply to Defendant’s motion to dismiss, and if the Court prefers to adjust the motion hearing date and Initial Case Management Conference accordingly, (ii) continuing those events from Wednesday, February 16, 2022 at 2:00 p.m. to a date after February 25, 2022. In support, the parties state as follows:

1 1. Defendant Roblox Corporation filed a Motion to Dismiss and Motion to Strike
2 Plaintiff's complaint (the "Motions") on December 10, 2021. (Dkt. 25.) The current deadline for
3 Plaintiff to file a response to the Motions is January 14, 2022, and the current deadline for
4 Defendant to file a reply is January 28, 2022. (*Id.*)

5 2. The parties previously agreed to set the Initial Case Management Conference to
6 coincide with the hearing on Roblox's Motions. Accordingly, the Court previously (by the
7 parties' stipulated request) scheduled the hearing on Roblox's Motions and the Initial Case
8 Management Conference for 2:00 p.m. via videoconference on Wednesday, February 16, 2022.
9 (Dkt. 24.)

10 3. Plaintiff has requested, and Defendant has agreed to, a brief seven (7)-day
11 extension of the deadline to respond to the Motions, due to many individuals on Plaintiff's legal
12 team and/or their family members testing positive for COVID-19 over the last few weeks, and
13 the attendant consequences (namely, lack of childcare) which have interfered with their business
14 operations.

15 4. Accordingly, the parties have agreed to stipulate (subject to the Court's order) to
16 the following modified briefing schedule for the Motions:

- 17 • Plaintiff shall file a response to the Motions on or before January 20, 2022;
- 18 • Roblox shall file any reply in support of its motions on or before February 4,
19 2022;

20 5. The parties' requested extension does not directly interfere with the February 16,
21 2022 hearing on the Motions (and the Initial Case Management Conference set to follow);
22 however, should the Court wish to continue those events to a later date, the parties request that
23 both the hearing and the Initial Case Management Conference be continued to a date after
24 February 25, 2022, due to scheduling conflicts the prior week.

25 6. There have been two other time modification in this case, as set out in the
26 accompanying Declaration of Lily E. Hough.

27 **IT IS SO STIPULATED** (*subject to Court order*).

28 Date: January 11, 2022

 By: /s/ Lily E. Hough
 Rafey Balabanian SBN 315962)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

rbalabanian@edelson.com
Lily Hough (SBN 315277)
lhough@edelson.com
EDELSON PC
150 California Street, 18th Floor
San Francisco, California 94111
Tel: 415.212.9300
Fax: 415.373.9435

Mark S. Reich (*pro hac vice* forthcoming)
Courtney E. Maccarone (*pro hac vice* forthcoming)
LEVI & KORSINSKY, LLP
55 Broadway, 10th Floor
New York, NY 10006
Telephone: 212-363-7500
Facsimile: 212-363-7171
Email: mreich@zlk.com
Email: cmaccarone@zlk.com

Adam M. Apton (SBN 316506)
LEVI & KORSINSKY, LLP
388 Market Street, Suite 1300
San Francisco, CA 94111
Telephone: 415-373-1671
Facsimile: 212-363-7171
Email: aapton@zlk.com

Attorneys for Plaintiff Jane Doe and the Putative Class

DATED: January 11, 2022

By: /s/ Anthony J. Weibell
Anthony J Weibell (SBN 238850)
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, Ca 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100
Email: aweibell@wsgr.com

Attorneys For Defendant Roblox Corporation

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:

1. Plaintiff shall file any opposition to Roblox’s motion to dismiss on or before January 20, 2022;
2. Roblox shall file its reply in support of its motion to dismiss on or before February 4, 2022;
3. The hearing on Roblox’s motion to dismiss ~~is~~ remains set for February 16, 2022, to be followed by the Initial Case Management Conference; and
4. The parties shall file a Joint Initial Case Management Statement seven (7) days prior to the Initial Case Management Conference.

ENTERED: January 11, 2022


Honorable William H. Orick
United States District Court

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION OF FILING

The undersigned hereby attests that concurrence in the filing of this document has been
duly obtained from all other signatories hereto.

By: /s/ Lily E. Hough