

1 Robert F. Kramer (SBN 181706)
 2 rkramer@kramerday.com
 3 M. Elizabeth Day (SBN 177125)
 4 eday@kramerday.com
 5 David Alberti (SBN 220625)
 6 dalberti@kramerday.com
 7 Sal Lim (SBN 211836)
 8 slim@kramerday.com
 9 Russell Tonkovich (SBN 233280)
 10 rtonkovich@kramerday.com
 11 Marc Belloli (SBN 244290)
 12 mbelloli@kramerday.com
 13 Sven Raz (SBN 222262)
 14 sraz@kramerday.com
 15 Ryan Dooley (SBN 321645)
 16 rdooley@kramerday.com

**KRAMER DAY ALBERTI
 LIM TONKOVICH & BELLOLI LLP**
 577 Airport Boulevard, Suite 250
 Burlingame, California 94010
 Telephone: (650) 825-4300
 Facsimile: (650) 460-8443

Attorneys for Plaintiff
 Express Mobile, Inc.

COOLEY LLP
 HEIDI L. KEEFE (178960)
 (hkeefe@cooley.com)
 ELIZABETH L.
 STAMESHKIN (260865)
 (lstameshkin@cooley.com)
 3175 Hanover Street
 Palo Alto, California 94304
 Telephone: (650) 843 5000
 Facsimile: (650) 849 7400

COOLEY LLP
 PHILLIP E. MORTON
 1299 Pennsylvania Avenue,
 NW, Suite 700
 Washington, DC 20004
 Telephone: (202) 842-7800
 Email: pmorton@cooley.com

Attorneys for Defendant
 Meta Platforms, Inc.

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

19 EXPRESS MOBILE, INC.,
 20 *Plaintiff,*
 21 v.
 22 META PLATFORMS, INC.,
 23 *Defendant.*

Case No. 4:21-cv-06657-RS
**JOINT STIPULATION AND
 ORDER TO POSTPONE CASE
 MANAGEMENT CONFERENCE AND
 CORRESPONDING DEADLINES**

1 Plaintiff Express Mobile, Inc. (“Express Mobile”) and Defendant Meta Platforms, Inc.
2 (“Meta”) (collectively the “parties”) file this Joint Stipulation and respectfully request that the
3 Court modify the case schedule to postpone the scheduled April 7, 2022 Case Management
4 Conference until two weeks after the Court’s decision regarding the unopposed motion to stay this
5 case that Meta filed on March 29, 2022 (ECF No. 100) based on IPRs having been instituted on all
6 of the asserted patents, subject to the Court’s calendar. The parties likewise request that the Court
7 postpone any corresponding deadlines, including the due date for the Case Management Statement.

8 A Case Management Conference is currently scheduled for April 7, 2022, with a Case
9 Management Statement due on March 31, 2022. Meta has filed an unopposed motion to stay and
10 Express Mobile has filed a statement of non-opposition. (ECF Nos. 100, 101.) The parties believe
11 that it would be most efficient if the Court postpones the April 7, 2022 Case Management
12 Conference in the meantime.

13 Due to the foregoing, and to avoid unnecessary expenditure of the Court’s time and judicial
14 resources, the parties agree that good cause exists to postpone the upcoming Case Management
15 Conference until two weeks after the resolution of the pending motion to stay, and to postpone any
16 corresponding deadlines accordingly. Thus, the parties request that the Court postpone the Case
17 Management Conference and all related deadlines to correspond with the rescheduled Conference.

18 A stipulation with the same or similar terms has been filed or is being filed in each case in
19 which a Case Management Conference is currently scheduled on April 7, 2022:¹

- 20 • *Express Mobile, Inc. v. Meta Platforms, Inc.* No. 3:21-cv-06657-RS
- 21 • *Express Mobile, Inc. v. Atlassian Corp.* No. 3:21-cv-08942
- 22 • *Express Mobile, Inc. v. Google LLC* No. 3:21-cv-08944
- 23 • *Express Mobile, Inc. v. eBay Inc.* 3:21-cv-06656

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27 ¹ The parties in the *Atlassian* and *Google* cases have also agreed to provisions regarding briefing on a
28 potentially opposed motion to stay.

1 Dated: March 31, 2022

Respectfully submitted,

2
3 /s/ Robert F. Kramer

/s/ Phillip E. Morton

4 Robert F. Kramer (SBN 181706)
rkramer@kramerday.com
5 M. Elizabeth Day (SBN 177125)
eday@kramerday.com
6 David Alberti (SBN 220625)
dalberti@kramerday.com
7 Sal Lim (SBN 211836)
slim@kramerday.com
8 Russell Tonkovich (SBN 233280)
rtonkovich@kramerday.com
9 Marc Belloli (SBN 244290)
mbelloli@kramerday.com
10 Sven Raz (SBN 222262)
sraz@kramerday.com
11 Ryan Dooley (SBN 321645)
rdooley@kramerday.com

12
13 **KRAMER DAY ALBERTI
LIM TONKOVICH & BELLOLI LLP**

14 577 Airport Boulevard, Suite 250
15 Burlingame, California 94010
16 Telephone: (650) 825-4300
Facsimile: (650) 460-8443

17 *Attorneys for Plaintiff*
18 Express Mobile, Inc.

COOLEY LLP
HEIDI L. KEEFE (178960)
(hkeefe@cooley.com)
ELIZABETH L. STAMESHKIN (260865)
(lstameshkin@cooley.com)
3175 Hanover Street
Palo Alto, California 94304
Telephone: (650) 843 5000
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COOLEY LLP
PHILLIP E. MORTON
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Email: pmorton@cooley.com

Attorneys for Defendant
Meta Platforms, Inc.

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ORDER

PURSUANT TO STIPULATION IT IS SO ORDERED AS FOLLOWS:

GOOD CAUSE APPEARING, the Case Management Conference, currently scheduled for April 7, 2022 at 10:00 a.m. is postponed, and may be reset after resolution of Defendant Meta's unopposed motion to stay this case.

Dated: March 31, 2022



HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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ATTESTATION

Pursuant to Civil L.R. 5-1(i) regarding signatures, I attest that concurrence in the filing of this document has been obtained.

/s/ Heidi L. Keefe
Heidi L. Keefe