1 2 3 4 5 6 7 8	JACOB M. HEATH (SBN 238959) jheath@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025-1015 Telephone: +1 650 614 7400 Facsimile: +1 650 614 7401 MELISSA I. LEVIN (SBN 328146) melissalevin@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP 405 Howard Street San Francisco, CA 94105 Telephone: +1 415 773 5799 Attorneys for Defendant Meta Platforms, Inc.	Seth W. Wiener (SBN 203747) Law Offices of Seth W. Wiener 609 Karina Court San Ramon, CA 94582 Telephone: (925) 487-5607 Email: seth@sethwienerlaw.com W. Cook Alciati (admitted pro hac vice) Gardella Grace P.A. 80 M Street SE, 1st Floor Washington D.C., 20003 Telephone: (703) 721-8379 Email: calciati@gardellagrace.com Attorneys for Plaintiff Shared Partnership	
10			
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRIC	CT OF CALIFORNIA	
13			
14		G N 2 22 022((BS	
15	SHARED PARTNERSHIP,	Case No. 3:22-cv-02366-RS	
16	Plaintiff,	JOINT REQUEST TO EXTEND CASE SCHEDULE	
17	V.	ORDER	
18	META PLATFORMS, INC.,		
19	Defendant.	The Honorable Richard Seeborg	
20			
21			
22			
23			
24			
25			
26			
27			
28			
		JOINT REQUEST TO EXTEND CASE SCHEDU	

1	Plaintiff Shared Partnership ("Shared" or "Plaintiff") and Defendant Meta Platforms, Inc.		
2	("Meta") hereby jointly submit and move the Court for an order resetting the case schedule. The		
3	parties stipulate, subject to approval of the Court, as follows:		
4	1. On January 30, 2024, the parties scheduled a meet and confer and counsel for Meta		
5	provided a proposed extended schedule.		
6	2. On January 31, 2024, the parties met and conferred regarding, among other things		
7	the schedule for discovery.		
8	3. On January 31, 2024, counsel for Shared provided a counterproposal to Meta		
9	proposing a revised schedule.		
10	4. On January 31, 2024, counsel for Meta provided a counterproposal to Shared		
11	proposing a further revised schedule.		
12	5. On February 5, 2024, the Parties agreed to a proposed revised case schedule with a		
13	proposed trial date of September 23, 2024.		
14	6. The parties agreement is contingent on the following:		
15	a. The parties will confirm witness availability for depositions by February 7		
16	2024; and		
17	b. Following receipt of the Court's availability for trial, Shared indicated tha		
18	it would stipulate to the below schedule so long as trial begins on September		
19	23, 2024, subject to Meta's agreement that there will be no further schedule		
20	adjustments that require moving the trial date absent extenuating		
21	circumstances unrelated to the litigation.		
22	7. Subject to the foregoing, the parties have thus met and conferred in good faith and		
23	have agreed, subject to the Court's availability and approval, to extend the case schedule to the		
24	following:		
25			
26			
27			
- 1			

Event	Current Deadline	Deadline
Close of Fact Discovery	February 29, 2024	April 5, 2024
Further Case Management Conference	March 14, 2024	April 18, 2024
Opening Expert Reports	March 8, 2024	May 10, 2024
Rebuttal Expert Reports	April 5, 2024	June 7, 2024
Close of Expert Discovery	April 22, 2024	June 24, 2024
Pretrial Motion Cutoff	May 9, 2024	July 11, 2024
Pretrial Motion Hearing Date	June 6, 2024	August 8, 2024
Mediation Deadline	n/a	July 23, 2024
Pretrial Conference	June 28, 2024	August 30, 2024
Trial	July 15, 2024	September 23, 2024
Dated: February 6, 2024 Dated: February 6, 2024	W. COOK ALCIATI MICHAEL DORFMAN GARDELLA GRACE P.A. By: /s/ W. Cook Alciati W. COOK ALCIATI Attorney for Plaintiff SHARED PARTNERSHIP JACOB M. HEATH MELISSA LEVIN ORRICK, HERRINGTON & SUTCLIFFE LLP	
By: /s/ Jacob M. Heath JACOB M. HEATH Attorney for Defendant META PLATFORMS, INC.		
		•

CIVIL LOCAL RULE 5-1(h)(3) ATTESTATION I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto. Dated: February 6, 2024 By: /s/ Jacob M. Heath Jacob M. Heath PURSUANT TO STIPULATION, IT IS SO ORDERED. The case schedule is extended as agreed to by the parties. Dated: February 7, 2024 UNITED STATES DISTRICT COURT JUDGE