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16 UNITED STATES DISTRICT COURT
 17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

18 IN RE META PIXEL HEALTHCARE
 19 LITIGATION

20 This Document Relates to:

21 All Actions.

Case No. 3:22-cv-3580-WHO (VKD)
 ORDER GRANTING
**STIPULATED MOTION FOR
 RELIEF FROM DEADLINE IN DKT.
 850**

CLASS ACTION

The Honorable Virginia K. DeMarchi
 Re: Dkt. No. 897

1 **STIPULATED MOTION**

2 On January 15, 2025, the Court ordered Plaintiffs to serve their 30(b)(6) deposition notice
3 by the following week and that “[t]he parties shall promptly confer regarding disagreements
4 regarding the topics in Plaintiffs’ Rule 30(b)(6) deposition notice.” Dkt. 772.

5 Plaintiffs served their 30(b)(6) deposition notices on January 20, 2025 and January 24,
6 2025.

7 On February 18, 2025, the Court ordered that “[a]ny dispute about plaintiffs’ Rule
8 30(b)(6) deposition notice to Meta must be submitted for resolution no later than March 11,
9 2025.” Dkt. 850.

10 On February 12 and February 14, 2025, the parties informally discussed some of Meta’s
11 concerns as to the 30(b)(6) notices.

12 Meta served objections to Plaintiffs’ 30(b)(6) notices on March 10, 2025.

13 In order to ensure that the parties are able to fully discuss their disputes before seeking
14 relief from the Court, while at the same time recognizing the goals of Dkt. 850 to prevent delay,
15 the parties jointly move pursuant to Rule 26 and the Court’s inherent power to control the case
16 schedule that the Court enter the following order:

- 17 1. The deadline for the parties to submit any disputes about Plaintiffs’ Notices of
18 30(b)(6) deposition shall be extended to March 20, 2025.
- 19 2. At least one member of each party’s lead counsel team must attend a final meet-and-
20 confer concerning Meta’s 30(b)(6) objections by March 14, 2025.
- 21 3. Plaintiffs must send Meta any draft joint letter briefs on any 30(b)(6) issues remaining
22 after this conference by March 17, 2025.
- 23 4. Meta must return its response(s) to Plaintiffs by March 19, 2025 for filing on March
24 20, 2025.
- 25 5. If either party fails to meet any of these deadlines, the other party may file a unilateral
26 motion for appropriate relief as to the 30(b)(6) deposition.

1 **SIGNATURE ATTESTATION**

2 The CM/ECF user filing this paper attests that concurrence in its filing has been obtained
3 from its other signatories.

4
5 RESPECTFULLY SUBMITTED AND DATED this 11th day of March, 2025.

6 By: /s/ Jason 'Jay' Barnes
Jason 'Jay' Barnes

By: /s/ Lauren R. Goldman
Lauren R. Goldman

7
8 *Attorneys for Plaintiffs and the Proposed Class* *Attorneys for Defendant Meta Platforms, Inc.*

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6
7 PURSUANT TO STIPULATION, IT IS SO ORDERED.

8 Dated: March 12, 2025

9 

10 Virginia K. DeMarchi

11 United States Magistrate Judge