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

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
 corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
 OMNIBUS DISCOVERY LETTER BRIEF**

1 Pursuant to Civ. L.R. 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher  
2 Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang,  
3 Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher  
4 Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Defendant”) (collectively, the  
5 “Parties”) by and through their respective counsel stipulate to the following:

6 WHEREAS, the Court entered an Order extending the deadline for raising issues regarding  
7 existing written discovery to November 8, 2024, Dkt. No. 258; and

8 WHEREAS, Plaintiffs seek to raise five discovery issues, each consisting of a five-page  
9 joint letter brief. Plaintiffs identified and briefed those five issues in a 12.5 page discovery brief  
10 that Plaintiffs provided to Defendant on November 6 (“Five Disputed Issues”);

11 WHEREAS, without waiver of its objections or rights (including with respect to the  
12 propriety of splitting discovery issues into separate briefs and the timing of Plaintiffs’ letter  
13 briefing), and only with respect to the Five Disputed Issues, Defendant does not oppose filing a  
14 single combined letter brief in this instance instead of five separate ones; and

15 WHEREAS, for purposes of administrative efficiency, the parties agree to file one omnibus  
16 discovery letter brief addressing the Five Disputed Issues (“Omnibus Discovery Brief”) instead of  
17 filing five separate discovery letter briefs;

18 WHEREAS, to assist with the orderly exchange and finalization of the Omnibus Discovery  
19 Brief, the parties have agreed that rather than revising portions of their respective briefs after  
20 exchanging them, each side shall be permitted to put in a “Further Response” – not to exceed .5  
21 pages for each of the Five Disputed Issues (i.e. 2.5 additional pages, total, per side). The total  
22 length of the Omnibus Discovery Brief shall not exceed 30 pages.

23 IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Defendant,  
24 that the parties shall file the Omnibus Discovery Brief totaling 30 pages (12.5 pages plus a 2.5 page  
25 “Further Response” per side), along with accompanying exhibits, on November 8, 2024.

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2 Dated: November 8, 2024

3 By: /s/ Bobby Ghajar

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*Attorneys for Defendant*

*META PLATFORMS, INC.*

Respectfully Submitted,

By: /s/ Maxwell V. Pritt

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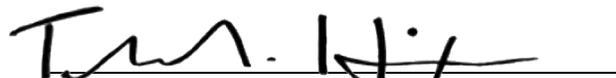
*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

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**PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.** The Parties shall be permitted to file one omnibus discovery letter brief covering the Five Disputed Issues (as defined in the Stipulation) with 15 pages per side in accordance with the Stipulation, along with accompanying exhibits, on November 8, 2024.

DATED: November 15, 2024

  
HON. THOMAS S. HIXSON  
United States Magistrate Judge

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**ECF ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiffs concurs in the filing of this document.

/s/ Maxwell V. Pritt