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17 Attorneys for Defendants/Counter-Plaintiffs
 18 VARIOUS, INC., *et al.*

19 UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

21 FACEBOOK, INC.,
 22 Plaintiff,
 23 v.

24 VARIOUS, INC.; GMCI INTERNET
 25 OPERATIONS, INC.; TRAFFIC CAT, INC.;
 FRIENDFINDER NETWORKS INC.; and
 26 DOES 1-100,
 27 Defendants.

Case No. 4:11-cv-01805-SBA (DMR)

**JOINT STIPULATION FOR STAY and
~~PROPOSED~~ ORDER**

28 AND RELATED COUNTERCLAIMS

1 Pursuant to Local Rule 7-12, Plaintiff Facebook, Inc. (“Facebook”) and Defendants
2 Various, Inc., GMCI Internet Operations, Inc., Traffic Cat, Inc. and FriendFinder Networks Inc.
3 (collectively “Defendants”) hereby stipulate that this case be stayed in favor of continued
4 settlement discussions between the parties with the continued assistance, as needed, from
5 Magistrate Judge Jacqueline Scott Corley, which the parties believe are likely to resolve the case.

6 On November 4, 2011 the parties participated in a full day settlement conference with
7 Magistrate Judge Corley which continued until after 6:00 p.m. and significant progress was made
8 to resolve all disputes. While meaningful progress toward settlement was made, several issues
9 require further discussion. The parties believe that continued discussions between the parties will
10 likely lead to a settlement. It is the parties’ belief that a stay will conserve judicial resources,
11 economy and time. The parties further believe that a stay of the litigation, including the
12 December 30, 2011 deadline to amend pleadings or add parties and any and all other deadlines,
13 will facilitate a settlement. Accordingly, at the suggestion of Magistrate Judge Corley and subject
14 to the approval of the Court, the parties hereby stipulate that:

- 15 1. This case is stayed indefinitely in favor of continued settlement discussions under the
16 supervision of Magistrate Judge Corley;
- 17 2. The December 30, 2011 deadline to add parties and amend the complaint is vacated and
18 will be reset to a later date should the stay be lifted;
- 19 3. All discovery deadlines, including all deadlines for third parties to respond to subpoenas,
20 are vacated and will be reset to a later date should the stay be lifted;
- 21 4. Any party may lift the stay by first notifying Magistrate Judge Corley and all other parties
22 and by filing a Notice of Dissolution of Stay five (5) days thereafter; and

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5. The January 12, 2012 case management conference will proceed as scheduled should the case not be resolved before that date.

SO STIPULATED:

Dated: November 7, 2011

COOLEY LLP
JEFFREY T. NORBERG (215087)

/s/ Jeffrey T. Norberg
Jeffrey T. Norberg (215087)
Attorneys for Plaintiff
FACEBOOK, INC.

KATTEN MUCHIN ROSENMAN LLP
KRISTIN L. HOLLAND (187314)

/s/ Kristin L. Holland
Kristin L. Holland (187314)
Attorneys for Defendants/Counter-Plaintiffs
VARIOUS, INC., et al.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/7/11

Saundra B. Armstrong
The Honorable Saundra Brown Armstrong
United States District Judge

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GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from each of the signatories and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ Jeffrey T. Norberg
Jeffrey T. Norberg
Attorneys for Plaintiff
FACEBOOK, INC.