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12 Attorneys for Defendants
 GOOGLE LLC, GOOGLE IRELAND LTD.,
 13 GOOGLE COMMERCE LTD., and GOOGLE ASIA
 PACIFIC PTE. LTD.

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 17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 OAKLAND DIVISION

20 UNLOCKD MEDIA, INC.
 LIQUIDATION TRUST, by and
 21 through its duly appointed trustee,
 Peter S. Kaufman,

22
 23 Plaintiff,

v.

24 GOOGLE LLC; GOOGLE IRELAND
 LIMITED; GOOGLE COMMERCE
 25 LIMITED; and GOOGLE ASIA PACIFIC
 PTE. LIMITED,

26
 27 Defendants.

Case No. 4:21-cv-07250-HSG

**JOINT STIPULATION TO EXTEND
 DEADLINE TO EXCHANGE INITIAL
 DISCLOSURES PURSUANT TO FEDERAL
 RULE OF CIVIL PROCEDURE 26(a)(1)(C)
 AND ORDER**

Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil Local Rules 6-2 and 7-12 and Federal Rule of Civil Procedure 26(a)(1)(C),
2 Plaintiff Unlockd Media, Inc. Liquidation Trust, by and through its duly appointed trustee, Peter S.
3 Kaufman (“Plaintiff”), and Defendants Google LLC, Google Ireland Limited, Google Commerce
4 Limited, and Google Asia Pacific Pte. Limited (“Defendants”) (collectively, the “Parties”), by and
5 through their attorneys of record, hereby stipulate and agree as follows:

6 WHEREAS, Plaintiff filed this action on September 17, 2021 (ECF No. 1);

7 WHEREAS, on March 14, 2022, Defendants filed a Motion to Dismiss the First Amended
8 Complaint (ECF No. 60);

9 WHEREAS, pursuant to the Parties’ stipulation and this Court’s order, the Parties’ initial Case
10 Management Conference and Defendants’ Motion to Dismiss are set to be heard on September 29,
11 2022 at 2:00 p.m. PT (ECF No. 71);

12 WHEREAS, pursuant to Federal Rule of Civil Procedure 26(a)(1)(C), parties are generally
13 required to exchange initial disclosures at or within 14 days after the parties’ Rule 26(f) conference
14 unless a different time is set by stipulation or court order;

15 WHEREAS, given the pending Motion to Dismiss, the Parties believe good cause exists to
16 extend the date for exchange of initial disclosures to twenty (20) days after this Court rules on
17 Defendants’ pending Motion to Dismiss (ECF No. 60) if the Motion is denied; and if the Court grants
18 the Motion to Dismiss with leave to amend, until twenty (20) days after the filing of an answer or other
19 responsive pleading to the amended operative complaint;

20 WHEREAS, this stipulation is not made for any improper purpose and will not prejudice either
21 Party;

22 WHEREAS, this stipulation is not intended to operate as an admission of any factual allegation
23 or legal conclusion and is submitted subject to and without waiver of any rights, defenses, affirmative
24 defenses, or objections; and

25 WHEREAS, the requested modifications will not otherwise impact the schedule for the case.

26 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that the
27 deadline for the Parties to exchange initial disclosures as required under Federal Rule of Civil
28 Procedure 26(a) is extended to twenty (20) days after this Court rules on Defendants’ pending Motion

1 to Dismiss (ECF No. 60) if the Motion is denied; and if the Court grants the Motion to Dismiss with
2 leave to amend, until twenty (20) days after the filing of an answer or other responsive pleading to the
3 amended operative complaint.

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5 **IT IS SO STIPULATED.**

6 Dated: September 19, 2022

COOLEY LLP

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9 By: /s/ Beatriz Mejia
Beatriz Mejia

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11 Attorneys for Defendants
12 GOOGLE LLC, GOOGLE IRELAND LTD.,
13 GOOGLE COMMERCE LTD., GOOGLE ASIA
14 PACIFIC PTE. LTD.

15 Dated: September 19, 2022

DIAMOND McCARTHY LLP

16
17 By: /s/ Grace J. Pak
Grace J. Pak

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19 Attorneys for Plaintiff
20 UNLOCKD MEDIA, INC. LIQUIDATION TRUST,
21 by and through its duly appointed trustee, PETER S.
22 KAUFMAN
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ORDER

Pursuant to the Parties’ stipulation and good cause having been shown, it is ordered that the deadline for the Parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) is extended to twenty (20) days after this Court rules on Defendants’ pending Motion to Dismiss (ECF No. 60) if the Motion is denied; and if the Court grants the Motion to Dismiss with leave to amend, until twenty (20) days after the filing of an answer or other responsive pleading to the amended operative complaint.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/20/2022


Hon. Haywood S. Gilliam, Jr.
UNITED STATES DISTRICT JUDGE