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

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 Plaintiff,

23 v.

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

26 Defendants.
 27

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

**JOINT STIPULATION AND ORDER TO
 CONTINUE MOTION TO DISMISS
 HEARING AND CASE MANAGEMENT
 CONFERENCE (as modified)**

Hon. Haywood S. Gilliam, Jr.

1 Pursuant to Civil Local Rules 6-2, 7-12, and 16-2(d)–(e), Plaintiff Unlockd Media, Inc.
2 Liquidation Trust, by and through its duly appointed trustee, Peter S. Kaufman (“Plaintiff”) and
3 Defendants Google LLC, Google Ireland Limited, Google Commerce Limited, and Google Asia
4 Pacific Pte. Limited (“Defendants”) (collectively, the “Parties”), by and through their attorneys of
5 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 were previously set to be heard on
11 September 29, 2022 at 2:00 p.m. PT (ECF No. 71), but was continued by the Court to
12 October 27, 2022 (ECF No. 89);

13 WHEREAS, on September 29, 2022, given counsel for the Parties’ conflicts and pursuant to
14 the Parties’ stipulation, the Court continued the initial Case Management Conference and hearing on
15 Defendants’ Motion to Dismiss to November 10, 2022 (ECF No. 91);

16 WHEREAS, on November 7, 2022, this Court continued the initial Case Management
17 Conference and the Motion to Dismiss hearing to December 8, 2022 (ECF No. 93);

18 WHEREAS, counsel for both Parties have unavoidable conflicts on December 8, 2022;

19 WHEREAS, the Parties believe good cause exists to continue the initial Case Management
20 Conference and hearing on Defendants’ Motion to Dismiss to preferably (1) December 15, 2022 at
21 2:00 p.m. PT; or alternatively, in case December 15, 2022 does not work with the Court’s schedule,
22 (2) January 26, 2023 at 2:00 p.m. PT;

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

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 hearing for the Parties’ initial Case Management Conference and Defendants’ Motion to Dismiss be
28 continued to:

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- (1) Preferably December 15, 2022 at 2:00 p.m. PT; or
- (2) Alternatively, in case December 15, 2022 does not work with the Court’s schedule, January 26, 2023 at 2:00 p.m. PT.

IT IS SO STIPULATED.

Dated: November 9, 2022

COOLEY LLP

By: /s/ Beatriz Mejia
Beatriz Mejia

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

Dated: November 9, 2022

DIAMOND McCARTHY LLP

By: Justin Strother
Justin Strother (*admitted pro hac vice*)

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


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ORDER

Pursuant to the Parties' stipulation and good cause having been shown, it is ordered that the initial Case Management Conference and the Motion to Dismiss hearing scheduled for November 10, 2022 is continued to January 26, 2022 at 2:00 p.m. PT.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 1/9/2022_


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