

1 Shylah R. Alfonso (admitted *pro hac vice*)  
 2 SAlfonso@perkinscoie.com  
 3 Tiffany Lee, Bar No. 303007  
 4 TiffanyLee@perkinscoie.com  
 5 1201 Third Avenue, Suite 4900  
 6 Seattle, WA 98101-3099  
 7 Telephone: 206.359.8000  
 8 Facsimile: 206.359.9000  
 9 PERKINS COIE LLP

10 Attorneys for Defendant  
 11 LINKEDIN CORPORATION  
 12 [additional counsel listed below signature]

13 Brian J. Dunne, Bar No. 275689  
 14 bdunne@bathaedunne.com  
 15 Edward M. Grauman, (admitted *pro hac vice*)  
 16 egrauman@bathaedunne.com  
 17 901 South MoPac Expressway  
 18 Barton Oaks Plaza I, Suite 300  
 19 Austin, TX 78746  
 20 Phone: (213) 462-2772

21 Attorneys for Plaintiffs  
 22 TODD CROWDER, KEVIN SCHULTE, and  
 23 GARRICK VANCE, on behalf of the putative class  
 24 [additional counsel listed below signature]

25 **UNITED STATES DISTRICT COURT**  
 26 **NORTHERN DISTRICT OF CALIFORNIA**  
 27 **OAKLAND DIVISION**

28 TODD CROWDER, KEVIN SCHULTE,  
 and GARRICK VANCE, on behalf of  
 themselves and all others similarly situated,

Plaintiffs,

v.

LINKEDIN CORPORATION,

Defendant.

Case No. 4:22-cv-00237-HSG

**STIPULATED REQUEST AND  
 ORDER RE LEAVE TO FILE  
 SUPPLEMENTAL BRIEFS [CIVIL L.R.  
 7-3(d), 7-12]**

Judge: Hon. Haywood S. Gilliam, Jr.

1 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

2 WHEREAS, on May 10, 2023, Defendant LinkedIn Corporation (“LinkedIn”) filed a  
3 Motion to Dismiss Plaintiffs’ First Amended Complaint for failure to state a plausible claim.  
4 Dkt. No. 73. The motion was fully briefed on June 21, 2023, and the Court heard the motion on  
5 July 27, 2023;

6 WHEREAS, on July 28, 2023, the Court issued an order partially lifting the stay of  
7 discovery and instructing LinkedIn to “produce to Plaintiffs any private API agreements  
8 between LinkedIn and HootSuite, Amobee, Annalect, Ogilvy, or Sprinklr by August 10, 2023.  
9 All other discovery beyond the production of these specified private API agreements remains  
10 stayed unless otherwise ordered.” Dkt. No. 78;

11 WHEREAS, pursuant to the Court’s order, LinkedIn produced certain API agreements  
12 to Plaintiffs on August 10, 2023; and

13 WHEREAS, the parties met and conferred on August 11, 2023, and agreed that it would  
14 assist the Court to provide copies of the API agreements and to provide the parties’ respective  
15 views of how those agreements should inform the Court’s analysis of LinkedIn’s motion, if at  
16 all;

17 NOW THEREFORE, the parties, by and through their attorneys, stipulate and agree  
18 pursuant to Civil Local Rule 7-3(d) and 7-12 that, subject to the Court’s approval, the parties  
19 shall be permitted to file supplemental briefs of no more than five (5) pages each, limited to  
20 discussing the recently-produced API agreements and their impact, if any, on LinkedIn’s  
21 motion. The parties shall file their briefs by 5:00 p.m. Pacific time, five (5) business days after  
22 the Court’s order granting leave. LinkedIn’s brief will attach copies of the API agreements or  
23 representative excerpts thereof as agreed to by Plaintiffs.

24 IT IS SO STIPULATED.

25 DATED: August 14, 2023

PERKINS COIE LLP

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27 By: /s/ Shylah R. Alfonso  
Shylah R. Alfonso

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Shylah R. Alfonso (admitted *pro hac vice*)  
SAlfonso@perkinscoie.com  
Tiffany Lee, Bar No. 303007  
TiffanyLee@perkinscoie.com  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
Telephone: 206.359.8000  
Facsimile: 206.359.9000

Elliott J. Joh, Bar No. 264927  
EJoh@perkinscoie.com  
Lauren Trambley, Bar No. 340634  
LTrambley@perkinscoie.com  
505 Howard Street, Suite 1000  
San Francisco, CA 94105-3204  
Telephone: 415.344.7000  
Facsimile: 415.344.7050

Jon B. Jacobs (admitted *pro hac vice*)  
JBJacobs@perkinscoie.com  
700 13th Street, NW  
Suite 800  
Washington, D.C. 20005-3960  
Telephone: 202.654.6200  
Facsimile: 202.654.6211

Attorneys for Defendant  
LINKEDIN CORPORATION

DATED: August 14, 2023

BATHAE DUNNE LLP

By: /s/ Brian J. Dunne  
Brian J. Dunne

Brian J. Dunne, Bar No. 275689  
bdunne@bathaeedunne.com  
Edward M. Grauman, (admitted *pro hac vice*)  
egrauman@bathaeedunne.com  
901 South MoPac Expressway  
Barton Oaks Plaza I, Suite 300  
Austin, TX 78746  
Phone: (213) 462-2772

Yavar Bathae, Bar No. 282388  
yavar@bathaeedunne.com

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Andrew C. Wolinsky, (admitted *pro hac vice*)  
awolinsky@bathaedunne.com  
445 Park Avenue, 9th Floor  
New York, NY 10022  
Tel.: (332) 322-8835

Attorneys for Plaintiffs  
TODD CROWDER, KEVIN SCHULTE, and  
GARRICK VANCE, on behalf of the putative class

**Local Rule 5-1(h)(3) Attestation**

I, Elliott J. Joh, the filer of this document, attest that each of the signatories to this document have concurred in the filing of this document.

/s/ Elliott J. Joh  
Elliott J. Joh

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/15/2023



HAYWOOD S. GILLIAM, JR.  
United States District Judge