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 20 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 21 **OAKLAND DIVISION**

22 L.A.T., individually and as next of friend to
 minor plaintiffs P.T. and L.T.,

23 Plaintiffs,

24 v.

25 META PLATFORMS, INC., et al.,

26 Defendants.
 27
 28

CASE NO. 4:22-cv-04937-HSG

**STIPULATION AND ORDER TO STAY
 PROCEEDINGS PENDING JPML RULING**

Judge: Hon. Haywood S. Gilliam, Jr.
 Courtroom: 2, 4th Floor

1 **STIPULATION**

2 Pursuant to Civil Local Rule 7-12, Plaintiffs L.A.T., P.T., and L.T., and Defendants Meta
3 Platforms, Inc., YouTube, LLC, Google LLC, Alphabet Inc., TikTok Inc., and ByteDance Inc.
4 (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as
5 follows:

6 WHEREAS, there is a currently pending motion asking the Judicial Panel on Multidistrict
7 Litigation (the “MDL Panel”) to centralize this case with 28 other actions similar to this action and to
8 transfer the centralized actions to a different district (Mot. for Transfer and Coordination or
9 Consolidation under 28 U.S.C. § 1407, *In re Social Media Adolescent Addiction/Personal Injury*
10 *Product Liability Litigation*, MDL No. 3047 (J.P.M.L.) [the “MDL Transfer Motion”]);

11 WHEREAS, the Parties believe that the MDL Panel has set the MDL Transfer Motion for
12 consideration at its next hearing session, which is scheduled for September 29, 2022;

13 WHEREAS, stays have already been entered in other cases pending in this District that are
14 the subject of the MDL Transfer Motion (*See, e.g.,* Order, *Rodriguez v. Meta Platforms, Inc.*, No.
15 3:22-cv-00401 (N.D. Cal. Aug. 2, 2022), ECF No. 100 [“In light of the JPML proceedings, MDL No.
16 3047, the case is stayed pending further order.”]; Order, *Heffner v. Meta Platforms, Inc.*, No. 3:22-cv-
17 03849 (N.D. Cal. Aug. 2, 2022), ECF No. 13 [same]; Order, *Aranda v. Meta Platforms, Inc.*, No.
18 3:22-cv-04209 (N.D. Cal. Aug. 2, 2022), ECF No. 13 [same]; Order, *Roberts v. Meta Platforms, Inc.*,
19 No. 4:22-cv-04210 (N.D. Cal. Aug. 15, 2022), ECF No. 22 [same]; Order, *Wuest v. Meta Platforms,*
20 *Inc.*, No. 4:22-cv-04283 (N.D. Cal. Aug. 15, 2022), ECF No. 19 [same]; Order, *Martin v. Meta*
21 *Platforms, Inc.*, No. 3:22-cv-04286 (N.D. Cal. Aug. 15, 2022), ECF No. 17 [same]; Order, *Seekford*
22 *v. Meta Platforms, Inc. et al.*, No. 4:22-cv-03883 (N.D. Cal. Aug. 15, 2022), ECF No. 18 [same];
23 Order, *Spence v. Meta Platforms, Inc.*, No. 4:22-cv-03294 (N.D. Cal. Aug. 19, 2022), ECF No. 29
24 [same]; Order, *Flatt v. Meta Platforms, Inc. et al.*, No. 3:22-cv-04535 (N.D. Cal. Aug. 19, 2022),
25 ECF No. 16 [same]; Order, *M.C. v. Meta Platforms, Inc. et al.*, No. 4:22-cv-04529 (N.D. Cal. Aug.
26 22, 2022), ECF No. 26 [same]; Order, *T.K. v. Meta Platforms, Inc. et al.*, No. 3:22-cv-04588 (N.D.
27 Cal. Sept. 1, 2022), ECF No. 15 [same]);

28 WHEREAS, Plaintiffs filed the Complaint on August 29, 2022 (Dkt. 1);

1 NOW THEREFORE, the Parties, through their undersigned counsel, hereby stipulate, agree,
2 and respectfully request that the Court enter an Order establishing the following:

3 1. All proceedings and deadlines, including but not limited to the requirement for
4 Defendants to move to dismiss, answer, or otherwise respond to the Complaint, shall be STAYED in
5 this action pending further order of the court following the decision of the JPML on the pending
6 MDL Transfer Motion (MDL No. 3047);

7 2. In the event the JPML does not transfer this case pursuant to 28 U.S.C. § 1407,
8 Defendants shall have 30 days from the date of the MDL Panel's decision to respond to Plaintiffs'
9 Complaint. Should Defendants file any motion requiring a response from Plaintiffs, Plaintiffs shall
10 have 45 days to respond to such a motion and Defendants shall have 21 days to file any reply; and

11 3. The Parties reserve all other rights, including but not limited to, with respect to any
12 position taken by the Parties before the MDL Panel, Plaintiffs' ability to dismiss their claims against
13 any Defendants during the pendency of the stay, and Defendants' ability to object to issues related to
14 service and/or jurisdiction.

15 **IT IS SO STIPULATED.**

16
17 Respectfully submitted,

18 Dated: September 15, 2022

GIBSON, DUNN & CRUTCHER LLP

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20 By: /s/ Rosemarie T. Ring
 Rosemarie T. Ring

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23 Dated: September 15, 2022

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27 *Attorneys for Defendant Meta Platforms, Inc.*

1 Dated: September 15, 2022

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11 *Attorneys for Defendants YouTube, LLC,*
12 *Google LLC, and Alphabet Inc.*

13 Dated: September 15, 2022

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23 Dated: September 15, 2022

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25 *Attorneys for Plaintiffs*

