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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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ZOYA KOVALENKO,

Case No. 4:22-CV-05990-HSG

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Plaintiff,

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
TO PLAINTIFF'S FIRST REQUESTS  
FOR PRODUCTION TO ALL  
DEFENDANTS**

13

v.

**[N.D. CAL. CIV. L.R. 6-2]**

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KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DE VRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., AND MARK FAHEY,

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Defendants.

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STIPULATION TO EXTEND DEADLINE TO  
RESPOND TO PLAINTIFF'S FIRST  
REQUESTS FOR PRODUCTION TO ALL  
DEFENDANTS [4:22-CV-05990-HSG]

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22 Attorneys for Plaintiff Zoya Kovalenko  
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1 Defendants Kirkland & Ellis LLP (“K&E”), Michael De Vries, Michael W. De Vries, P.C.,  
2 Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey  
3 (collectively, “Defendants”) and Plaintiff Zoya Kovalenko (“Plaintiff”) (Plaintiff and Defendant  
4 collectively, the “Parties”), hereby stipulate pursuant to Civil Local Rule 6-2 as follows:

5 WHEREAS, Plaintiff served her First Requests for Production to All Defendants (the  
6 “Requests”) on April 20, 2024;

7 WHEREAS, the current deadline for Defendants to respond to the Requests is May 20,  
8 2024;

9 WHEREAS, it is Defendants' position that Plaintiff should have served document requests  
10 on each Defendant individually rather than on all eight (8) Defendants, collectively, and Plaintiff  
11 disagrees.

12 WHEREAS, Defendants require additional time to respond to the 68 Document Requests  
13 on behalf of each of the eight (8) Defendants;

14 WHEREAS, the Parties agree to extend the deadline for Defendants to respond to the  
15 Requests until June 19, 2024;

16 WHEREAS, the previous time modifications in this case are as follows:

- 17 • A stipulation to specially set the briefing schedule on nine of Defendants’ motions filed  
18 in response to Plaintiff’s Complaint was filed on December 20, 2022 (Dkt. 43) and  
19 granted on December 21, 2022 (Dkt. 44).
- 20 • A stipulation to extend deadlines to comply with initial discovery obligations pursuant  
21 to General Order No. 71 and to set the briefing schedule for K&E’s Anti-SLAPP  
22 Motion was filed on January 9, 2023 (Dkt. 59) and granted on January 10, 2023 (Dkt.  
23 61).
- 24 • A stipulation under Civil Local Rule 6-1(a) to extend time for Plaintiff to  
25 object/respond to K&E’s First Sets of Interrogatories and Requests for Production  
26 from September 7, 2023 to October 9, 2023 was filed on August 30, 2023 (Dkt. 93).
- 27 • A stipulation under Civil Local Rule 6-2 to extend time for Defendants to answer  
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1 Plaintiff's First Amended Complaint was filed on September 26, 2023 (Dkt. 95) and  
2 granted on September 27, 2023 (Dkt. 96).

- 3 • A stipulation under Civil Local Rule 6-1(a) to extend time for Plaintiff to  
4 object/respond to K&E's First Sets of Interrogatories and Requests for Production  
5 from October 9, 2023 to November 8, 2023 was filed on October 6, 2023 (Dkt. 100).
- 6 • A stipulation under Civil Local Rules 6-1(b) and 6-2 to extend time regarding  
7 Defendants' Motion to Dismiss Plaintiff's First Amended Complaint was filed on  
8 October 27, 2023 (Dkt. 104) and granted on October 30, 2023 (Dkt. 106).
- 9 • A stipulation under Civil Local Rule 6-2 to specially set a briefing schedule on  
10 Plaintiff's motion to quash and to reset hearing dates was filed on December 27, 2023  
11 (Dkt. 114) and was granted on December 28, 2023 (Dkt. 115).

12 WHEREAS, the brief extension of time requested here would have no effect on the schedule  
13 for this case as no case schedule has yet been entered.

14 IT IS HEREBY STIPULATED by the Parties that the deadline for Defendants to file a  
15 response to the Requests is extended to June 19, 2024.

16 Respectfully submitted,

17 Dated: May 9, 2024

MARK R. THOMPSON  
Orrick, Herrington & Sutcliffe LLP

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By:                   /s/ Mark R. Thompson                    
Mark R. Thompson  
(Admitted *pro hac vice*)  
Attorneys for Defendants

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22 Dated: May 9, 2024

TANVIR H. RAHMAN  
Filippatos PLLC

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By:                   /s/ Tanvir H. Rahman                    
TANVIR H. RAHMAN  
(Admitted *pro hac vice*)  
Attorneys for Plaintiff

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**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/9/2024

  
HAYWOOD S. GILLIAM, JR.  
United States District Judge