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15 Attorneys for Defendants,
 16 GOOGLE INC.

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN JOSE DIVISION

20 MARY McKINNEY, et al.,
 21 Plaintiff,

22 v.

23 GOOGLE INC., a Delaware corporation,
 24 HTC CORP., a Taiwanese corporation, and
 25 T-MOBILE USA, INC., a Delaware
 26 corporation,
 27 Defendants.

Case No. C 10-01177 JW

Action filed: April 15, 2010

**DECLARATION OF MATTHEW L.
 LARRABEE IN SUPPORT OF
 STIPULATED REQUEST AND
 [PROPOSED] ORDER TO CONTINUE
 JUNE 21, 2010 CASE MANAGEMENT
 CONFERENCE AND RELATED
 DEADLINES**

1 I, Matthew L. Larrabee, declare pursuant to Civil L.R. 6-2 as follows:

2 1. I am an attorney at law licensed to practice in the State of California and am a
3 partner at the law firm of Dechert LLP, counsel of record for Defendant Google Inc. in this
4 action. I make this declaration in support of the Stipulated Request and [Proposed] Order to
5 Continue June 21, 2010 Case Management Conference and Related Deadlines. Unless otherwise
6 stated, I have personal knowledge of the matters stated herein and would competently testify
7 thereto if called upon as a witness;

8 2. On March 29, 2010 the parties stipulated that Defendants Google Inc., T-Mobile
9 USA, Inc., and HTC Corporation (the "Defendants") would respond to the complaint on May 25,
10 2010;

11 3. On May 21, 2010 the parties stipulated that Plaintiff would file an Amended
12 Complaint and that the initial pleadings would be calendared as follows: Plaintiff to file her
13 Amended Complaint by June 11, 2010; Defendants to file and serve any answer(s) or motion(s) to
14 dismiss by July 12, 2010; and, if any such motion(s) are filed, Plaintiff to file any opposition by
15 August 11, 2010 and Defendants to file any reply by August 25, 2010;

16 4. The Court has set a hearing on dispositive motions for November 1, 2010 at 9:00
17 AM;

18 5. A Case Management Conference is currently scheduled for June 21, 2010, and a
19 Case Management Statement is currently due on June 11, 2010;

20 6. After Plaintiff files her Amended Complaint, Defendants anticipate filing one or
21 more motions to dismiss under Rule 12 of the Federal Rules of Civil Procedure that will seek
22 dismissal of the entire action;

23 7. Given that Plaintiff's Amended Complaint will not be filed until the current due
24 date of the Case Management Statement, and Defendants' motion(s) to dismiss will seek
25 dismissal of the entire action, the parties to this action have agreed, subject to the Court's
26 approval, that the June 21, 2010 Case Management Conference, and related deadlines for
27 complying with the requirements of Rule 26 of the Federal Rules of Civil Procedure, including
28 the June 11, 2010 deadline set by the Court for filing a Case Management Statement, should be

