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

21 IN RE: FACEBOOK PRIVACY  
 22 LITIGATION

Case No. 10-cv-02389-JW

**STIPULATION AND [PROPOSED] ORDER  
 REGARDING BRIEFING SCHEDULE FOR  
 MOTION TO DISMISS FIRST AMENDED  
 CONSOLIDATED COMPLAINT (CIVIL  
 LOCAL RULE 6-1(B))**

ACTION FILED: May 28, 2010

1 This Stipulation is entered into by and among plaintiffs David Gould and Mike Robertson  
2 (collectively, "Plaintiffs") and defendant Facebook, Inc. ("Facebook") (Plaintiffs and Facebook  
3 collectively, "the Parties"), by and through their respective counsel.

4 WHEREAS on May 12, 2011 this Court dismissed Plaintiffs' Consolidated Complaint  
5 with leave to amend certain causes of action;

6 WHEREAS on June 13, 2011, Plaintiffs filed a First Amended Consolidated Class Action  
7 Complaint ("First Amended Complaint");

8 WHEREAS on July 15, 2011, Facebook filed a Motion to Dismiss the First Amended  
9 Complaint ("Motion");

10 WHEREAS the first available hearing date for the Motion is October 3, 2011;

11 WHEREAS under Civil Local Rule 6-1(b), the Parties may, by written stipulation, request  
12 a Court order extending the time for Plaintiffs' Opposition to and Facebook's Reply in support of  
13 the Motion;

14 WHEREAS extending the deadlines for Plaintiffs' Opposition to the Motion to August 11,  
15 2011 and for Facebook's Reply in support of the Motion to September 1, 2011 will not alter the  
16 date of any event or deadline already fixed by Court order or affect any scheduling for the case  
17 other than the dates of Plaintiffs' Opposition to and Facebook's Reply in support of the Motion;

18 AND

19 WHEREAS this brief extension of time will enable the Parties to provide better and more  
20 helpful briefing to the Court without affecting the hearing date on the Motion, the Court's  
21 preparation time in the weeks before the hearing, or any other aspect of the case schedule;

22 NOW, THEREFORE, the Parties hereby stipulate and agree, subject to approval by the  
23 Court, as follows:

24 1. The deadline for Plaintiffs' Opposition to Facebook's Motion to Dismiss the First  
25 Amended Complaint is extended to and including August 11, 2011; and

26 2. The deadline for Facebook's Reply in support of its Motion to Dismiss the First  
27 Amended Complaint is extended to and including September 1, 2011.

28 **IT IS SO STIPULATED.**

1 Dated: July 19, 2011

COOLEY LLP

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*/s/ Matthew D. Brown*

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Matthew D. Brown (196972)  
Attorneys for Defendant FACEBOOK, INC.

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5 Dated: July 19, 2011

ASCHENBRENER LAW, P.C.

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*/s/ Michael J. Aschenbrener*

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Michael J. Aschenbrener (277114)  
Attorneys for Plaintiffs

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9 Dated: July 19, 2011

NASSIRI & JUNG LLP

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*/s/ Kassra P. Nassiri*

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**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2011

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HON. JAMES WARE  
UNITED STATES DISTRICT JUDGE

**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all signatories have concurred in the filing of this Stipulation and [Proposed] Order Regarding Briefing Schedule for Motion to Dismiss First Amended Consolidated Complaint.

Dated: July 19, 2011

COOLEY LLP

/s/ Matthew D. Brown  
Matthew D. Brown (196972)

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