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14 Attorneys for Plaintiffs and the Putative Class

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

19 In re GOOGLE REFERRER HEADER PRIVACY
 20 LITIGATION

Case No. 5:10-cv-04809-EJD

CLASS ACTION

22 _____
 23 This Document Relates To: All Actions

**PLAINTIFFS’
 ADMINISTRATIVE MOTION
 FOR LEAVE TO FILE
 OVERSIZED REPLY
 MEMORANDUM IN SUPPORT
 OF MOTION FOR FINAL
 APPROVAL OF CLASS ACTION
 SETTLEMENT AND AWARD OF
 ATTORNEYS’ FEES, EXPENSES,
 AND INCENTIVE AWARD**

Hon. Edward J. Davila

1 Plaintiffs Gaos, Italiano, and Priyev (“Plaintiffs”), through their undersigned counsel,
2 pursuant to Civil Local Rule 7-11, respectfully request that this Honorable Court enter an Order
3 granting them leave to file a Reply Memorandum in Support of Motion for Final Approval of
4 Class Action Settlement and Award of Attorneys’ Fees, Expenses, and Incentive Awards in excess
5 of fifteen (15) pages. In support of this Administrative Motion, Plaintiffs state as follows:

6 1. On July 25, 2014 Plaintiffs Filed their Motion for Final Approval of Class Action
7 Settlement and Motion for Award of Attorneys’ Fees, Expenses, and Incentive Award. (Dkts. 65
8 and 66.)

9 2. Pursuant to this Court’s Order granting Preliminary Approval of the Parties’ Class
10 Action Settlement (Dkt. 63) and the Settlement Agreement incorporated by that Order (Dkt. 52-3),
11 Plaintiffs have the right to respond to objections no later than seven (7) days prior to the Final
12 Approval Hearing by filing a response with the Court.

13 3. As of this filing, Plaintiffs have received four (4) objections to the Settlement. Two
14 of these objections, filed at or near the objection deadline by “professional objectors” are
15 extensive and raise numerous objections. (See, e.g. Dkt. 70 (24-page objection) and Dkt.71 (14-
16 page objection.)

17 4. Plaintiffs did not receive an objection from Cameron Jan until Friday, August 15,
18 2014 despite being timely postmarked. (Dkt. 71.)

19 5. Plaintiffs are planning to respond to each objection made to the Settlement.

20 6. In the interest of efficiency, and rather than filing separate responses to each
21 objection, Plaintiffs intend to file a single response that addresses each and every objection in the
22 form of a Reply Memorandum in Support of Plaintiffs’ Motion for Final Approval of Class Action
23 Settlement and Motion for Award of Attorneys’ Fees, Expenses, and Incentive Award.

24 7. Under Civil Local Rule 7-4(b), reply memoranda may not exceed fifteen (15) pages
25 absent leave of Court.

26 8. To adequately address each objection in a single memorandum, Plaintiffs believe in
27 good faith that the filing of a Reply Memorandum in Support of their Motion for Final Approval
28 of Class Action Settlement and Motion for Award of Attorneys’ Fees, Expenses, and Incentive

1 Award in excess of fifteen (15) pages will be necessary.

2 9. Plaintiffs are confident that they can fully and effectively respond to every
3 objection to the Settlement in fewer than twenty-five (25) pages.

4 10. Plaintiffs' counsel have conferred with counsel for Defendant, and as set forth in
5 the stipulation attached hereto as Exhibit A, Defendant's counsel has no objection to Plaintiffs
6 filing a Reply Memorandum in Support of Motion for Final Approval of Class Action Settlement
7 and Motion for Award of Attorneys' Fees, Expenses, and Incentive awards in excess of fifteen
8 (15) pages and up to twenty-five (25) pages in length.

9 WHEREFORE, Plaintiffs Gaos, Italiano, and Priyev, individually and behalf of all other
10 similarly situated, respectfully request that the Court enter an Order (i) granting them to leave to
11 file a Reply Memorandum in Support of Motion for Final Approval of Class Action Settlement
12 and Award of Attorneys' Fees, Expenses, and Incentive Award of up to twenty-five (25) pages in
13 length, and (ii) awarding such other and further relief as the Court deems equitable and just.

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16 Dated: August 20, 2014

ASCHENBRENER LAW, P.C.

17

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s/ Michael Aschenbrener _____

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Michael Aschenbrener
ON BEHALF OF ATTORNEYS FOR
PLAINTIFFS AND THE CLASS

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CERTIFICATE OF SERVICE

The undersigned certifies that, on [date], he caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to counsel of record for each party.

Dated: August 20, 2014

ASCHENBRENER LAW, P.C.

By: s/ Michael Aschenbrener
Michael Aschenbrener