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8 Attorneys for Defendant
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10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**
 12 **SAN JOSE DIVISION**

12 RACHEL FREZZA and MAURO
 13 RODRIGUEZ, on their own behalf and all
 others similarly situated,
 14 Plaintiffs,
 v.
 15 GOOGLE INC.,
 Defendant.

CASE NO. 5:12-CV-00237-RMW

**STIPULATION ENLARGING TIME TO
 FILE SECOND AMENDED
 COMPLAINT AND ORDER**

Judge: Honorable Ronald M. Whyte

Initial Complaint Filed: January 13, 2012

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1 Pursuant to N.D. Cal. Civil Local Rule 6-1(b) and 6-2(a), this stipulated request is entered
2 into between Counsel for Plaintiffs Rachel Frezza and Mauro Rodriguez (collectively
3 “Plaintiffs”) and Defendant Google Inc. (“Google”).

4 WHEREAS, this Court granted Google’s Motion to Dismiss the First Amended
5 Complaint on April 22, 2013;

6 WHEREAS, on May 1, 2013, the Court ordered that any amended complaint must be
7 filed on or before May 31, 2013; and

8 WHEREAS, the extension of time requested here would serve the convenience of the
9 parties;

10 IT IS HEREBY STIPULATED AND AGREED that the parties jointly request that
11 Plaintiffs shall have until July 1, 2013 to file their Second Amended Complaint.

12 Pursuant to Civil Local Rule 6-2(a)(2), the parties state that on February 2, 2012,
13 Plaintiffs agreed to extend Google’s time to respond to the Complaint to March 16, 2012; on
14 March 30, 2012, the parties agreed to extend Plaintiffs’ time to file their Opposition to Google’s
15 Motion to Dismiss until April 20, 2012, and Google’s time to file its Reply until May 4, 2012; on
16 May 10, 2012, the parties stipulated and requested that the hearing on Google’s motion to
17 dismiss the complaint would be adjourned until June 15, 2012; on August 20, 2012, the parties
18 agreed that any case management conference would be adjourned until after the Court ruled on
19 Google’s Motion to Dismiss; on December 13, 2012, the parties stipulated to enlarge Google’s
20 time to respond to Plaintiff’s First Amended Complaint to January 22, 2013, and agreed that if
21 Google’s Response to the First Amended Complaint were not an answer, but rather a motion
22 pursuant to Fed. R. Civ. Proc. 12, then (i) Plaintiffs’ opposition to that motion would be filed no
23 later than thirty (30) days from the date of service of that motion; and (ii) Defendant’s reply
24 would be filed no later than twenty-one (21) days from the date of service of Plaintiffs’
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1 opposition; on December 20, 2013, the parties stipulated that Plaintiffs would have until and
2 including December 27, 2012 to file the First Amended Complaint, and that Google would have
3 until and including January 28, 2013 to respond to the First Amended Complaint; and on
4 February 13, 2013, the parties stipulated that the previously-scheduled March 15, 2013 hearing
5 on Google's Motion to Dismiss the First Amended Complaint should be adjourned until April
6 19, 2013.
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8 **IT IS SO STIPULATED AND REQUESTED**
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10 DATED: May 29, 2013

MAYER BROWN LLP

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12 By: s/ Jonathan A. Helfgott
13 Edward D. Johnson (SBN 189475)
14 Eric B. Evans (SBN 232476)
15 Jonathan A. Helfgott (SBN 278969)
Attorneys for Defendant
Google Inc.

16 DATED: May 29, 2013

SIPRUT PC

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18 By: /s/ Joseph J. Siprut
19 Joseph J. Siprut (*Pro Hac Vice*)
20 Aleksandra M.S. Vold (*Pro Hac Vice*)
21 Todd C. Atkins (SBN 208879)
Attorneys for Plaintiffs Rachel Frezza
and Mauro Rodriguez.

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23 Filer's attestation: In compliance with General Order 45(x)(B), I hereby attest that concurrence
24 in the filing of this Stipulation has been obtained from counsel for Plaintiffs, Joseph J. Siprut.

25 /s/ Jonathan A. Helfgott
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[] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED THAT:

Plaintiffs shall have until, and including, July 1, 2013 to file their Second Amended

Complaint.

DATED:

HON. RONALD M. WHYTE
UNITED STATES DISTRICT JUDGE