

1 GIBSON, DUNN & CRUTCHER LLP
 JOSHUA A. JESSEN, SBN 222831
 2 JJessen@gibsondunn.com
 JEANA BISNAR MAUTE, SBN 290573
 3 JBisnarMaute@gibsondunn.com
 PRIYANKA RAJAGOPALAN, SBN 278504
 4 PRajagopalan@gibsondunn.com
 ASHLEY M. ROGERS, SBN 286252
 5 ARogers@gibsondunn.com
 1881 Page Mill Road
 6 Palo Alto, California 94304
 Telephone: (650) 849-5300
 7 Facsimile: (650) 849-5333

8 GIBSON, DUNN & CRUTCHER LLP
 CHRISTOPHER CHORBA, SBN 216692
 9 CChorba@gibsondunn.com
 333 South Grand Avenue
 10 Los Angeles, California 90071
 Telephone: (213) 229-7000
 11 Facsimile: (213) 229-7520

12 Attorneys for Defendant
 FACEBOOK, INC.

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISON

17 MATTHEW CAMPBELL and MICHAEL
 HURLEY,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.

CASE NO. C 13-05996 PJH

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME FOR
 DEFENDANT FACEBOOK, INC. TO
 RESPOND TO PLAINTIFFS' MOTIONS
 TO COMPEL [DKT. NOS. 206-208]**

The Honorable Phyllis J. Hamilton

1 WHEREAS, on August 2, 2016, Plaintiffs filed three Motions to Compel (Dkt. 206, 207, and
2 208) pursuant to this Court’s Order of June 30, 2016, providing that “three discrete discovery
3 disputes re: updated source code, scope of word search and configuration table will be resolved by
4 Judge Hamilton” (Dkt. 203);

5 WHEREAS, the current deadline for Defendant Facebook, Inc. to respond to the Motions to
6 Compel is August 9, 2016 (*id.*);

7 WHEREAS, due to the summer holiday and travel schedules of Facebook’s counsel,
8 Facebook requested, and Plaintiffs agreed to, a short 10-day extension of time for Facebook to
9 respond to the Motions to Compel (up to and including August 19, 2016); and

10 WHEREAS, the parties have requested no previous time modifications for the Motions to
11 Compel, and the requested extension will not have a material effect on the schedule for this case;

12 NOW, THEREFORE, pursuant to Civil L.R. 6-2(a), and subject to the approval of the Court,
13 the Parties hereby stipulate and request that Facebook shall have until August 19, 2016 to respond to
14 Plaintiffs’ Motions to Compel.

15 DATED: August 3, 2016

GIBSON, DUNN & CRUTCHER LLP

16 By: _____/s/
17 JOSHUA A. JESSEN
18 Attorneys for Defendant FACEBOOK, INC.

19 DATED: August 3, 2016

LIEFF CABRASER HEIMANN & BERNSTEIN

20 By: _____/s/
21 MICHAEL W. SOBOL
22 Attorneys for Plaintiffs

23 **ATTORNEY ATTESTATION**

24 Pursuant to Civil Local Rule 5-1, I, Joshua A. Jessen, hereby attest that concurrence in the
25 filing of this document has been obtained from Michael W. Sobol.

26 DATED: August 3, 2016

GIBSON, DUNN & CRUTCHER LLP

27 By: _____/s/
28 JOSHUA A. JESSEN
Attorneys for Defendant FACEBOOK, INC.

1 **[PROPOSED] ORDER**

2 Having considered the Parties’ Stipulation, and good cause appearing, the Court hereby
3 GRANTS the Parties’ stipulation. It is HEREBY ORDERED that Facebook shall have until August
4 19, 2016 to respond to Plaintiffs’ Motions to Compel (Dkt. 206, 207, and 208).

5 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

6
7 DATED: _____

8 _____
9 The Honorable Phyllis J. Hamilton
10 United States District Court Judge