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11 Attorneys for Defendant
 FACEBOOK, INC.

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 OAKLAND DIVISION

16 MATTHEW CAMPBELL and MICHAEL
 HURLEY,

17 Plaintiffs,

18 v.

19 FACEBOOK, INC.,

20 Defendant.
 21

Case No. C 13-05996 PJH (SK)

**JOINT STIPULATION AND
 [PROPOSED] ORDER REGARDING
 CASE SCHEDULE**

1 WHEREAS, on June 30, 2016, the Court held a Case Management Conference wherein the
2 Court set the following deadlines: non-expert discovery shall be completed by November 30, 2016;
3 experts must be disclosed by January 18, 2017; and cross motions for summary judgment shall be
4 filed by January 18, 2017 (Dkt. 203);

5 WHEREAS, at the Case Management Conference, the Court inquired about whether the
6 parties had conducted a mediation, and suggested that the case might be well positioned for
7 settlement in light of the Court's order on class certification;

8 WHEREAS, since the Case Management Conference, the parties have conducted two
9 mediation sessions with Cathy Yanni at JAMS and have had several additional discussions about
10 resolution of this matter;

11 WHEREAS, the parties are continuing to make progress toward a resolution of this matter and
12 wish to focus their energies on those discussions;

13 WHEREAS, the parties have scheduled another mediation session for December 7, 2016;

14 WHEREAS, the parties also have been diligently pursuing the discovery ordered by the
15 Court, but due to scheduling needs related to final depositions and other discovery, the parties require
16 additional time to complete non-expert discovery, but wish to stay that discovery pending their
17 further discussions; and

18 WHEREAS, the parties have not previously requested any extension of the above-referenced
19 deadlines;

20 NOW, THEREFORE, subject to the approval of the Court, and for good cause shown, the
21 parties hereby stipulate and agree as follows: Discovery is stayed, and the existing case deadlines are
22 vacated. The parties shall update the Court by December 23, 2016, regarding whether a resolution
23 has been reached. In the event no resolution is reached by December 23, 2016, the discovery stay is
24 lifted, Facebook shall make its document production on that date, and the new case deadlines shall be

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1 as follows: non-expert discovery shall be completed by January 26, 2017; experts must be disclosed
2 by March 16, 2017; and cross motions for summary judgment shall be filed by March 16, 2017.

3 DATED: November 22, 2016

LIEFF CABRASER HEIMANN & BERNSTEIN

4 By: _____ /s/
5 MICHAEL W. SOBOL

6 Attorneys for Plaintiffs

7
8 DATED: November 22, 2016

GIBSON, DUNN & CRUTCHER LLP

9 By: _____ /s/
10 CHRISTOPHER CHORBA

11 Attorneys for Defendant Facebook, Inc.
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ATTORNEY ATTESTATION

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

DATED: November 22, 2016

GIBSON, DUNN & CRUTCHER LLP

By: _____/s/
CHRISTOPHER CHORBA

Attorneys for Defendant Facebook, Inc.

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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: Discovery is stayed, and the
4 existing case deadlines are vacated. The parties shall update the Court by December 23, 2016,
5 regarding whether a resolution has been reached. In the event no resolution is reached by December
6 23, 2016, the discovery stay is lifted, Facebook shall make its document production on that date, and
7 the new case deadlines shall be as follows: non-expert discovery shall be completed by January 26,
8 2017; experts must be disclosed by March 16, 2017; and cross motions for summary judgment shall
9 be filed by March 16, 2017.

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

11
12 DATED: _____

The Honorable Phyllis J. Hamilton
United States District Court Judge