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12 Attorneys for Defendant  
 FACEBOOK, INC.

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

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 REGARDING CASE SCHEDULE**

1 WHEREAS, on November 23, 2016, the Court ordered that discovery in this case be stayed,  
2 and the existing case deadlines vacated, pending an update by the parties on or before December 23,  
3 2016 regarding whether a resolution had been reached (Dkt. 221);

4 WHEREAS, concurrently with this Stipulation, the parties filed a Joint Status Report to notify  
5 the Court that the parties have reached a settlement-in-principle in this case, and intend to submit a  
6 written settlement agreement, and motion for preliminary approval of the settlement, on or before  
7 February 15, 2017;

8 NOW, THEREFORE, subject to the approval of the Court, and for good cause shown, the  
9 parties hereby stipulate and agree as follows: The stay on discovery and vacation of case deadlines  
10 previously ordered in this action shall remain in effect until February 15, 2017. In the event that a  
11 written settlement agreement and motion for preliminary approval are not submitted to the Court on  
12 or before February 15, 2017, the discovery stay is lifted, Facebook shall make its document  
13 production on that date, and the new case deadlines shall be as follows: non-expert discovery shall be  
14 completed by March 23, 2017; experts must be disclosed by May 11, 2017, and cross motions for  
15 summary judgment shall be filed by May 11, 2017.

16 Respectfully submitted,

17 DATED: December 21, 2016

GIBSON, DUNN & CRUTCHER LLP

19 By: \_\_\_\_\_ /s/  
20 JOSHUA A. JESSEN

21 Attorneys for Defendant Facebook, Inc.

22 DATED: December 21, 2016

LIEFF CABRASER HEIMANN & BERNSTEIN

24 By: \_\_\_\_\_ /s/  
25 MICHAEL W. SOBOL

26 Attorneys for Plaintiffs

1 **ATTORNEY ATTESTATION**

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

4  
5 DATED: December 21, 2016

GIBSON, DUNN & CRUTCHER LLP

6  
7 By: \_\_\_\_\_/s/\_\_\_\_\_  
8 JOSHUA A. JESSEN

9 Attorneys for Defendant Facebook, Inc.

10 **[PROPOSED] ORDER**

11 Having considered the Parties’ Stipulation, and good cause appearing, the Court hereby  
12 GRANTS the Parties’ stipulation. It is HEREBY ORDERED that the stay on discovery and vacation  
13 of case deadlines previously ordered in this action shall remain in effect until February 15, 2017. In  
14 the event that a written settlement agreement and motion for preliminary approval are not submitted  
15 to the Court on or before February 15, 2017, the discovery stay is lifted, Facebook shall make its  
16 document production on that date, and the new case deadlines shall be as follows: non-expert  
17 discovery shall be completed by March 23, 2017; experts must be disclosed by May 11, 2017, and  
18 cross motions for summary judgment shall be filed by May 11, 2017.

19  
20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21  
22 DATED: \_\_\_\_\_

23 \_\_\_\_\_  
24 The Honorable Phyllis J. Hamilton  
25 United States District Court Judge