

1 GIBSON, DUNN & CRUTCHER LLP
 JOSHUA A. JESSEN, SBN 222831
 2 JJessen@gibsondunn.com
 JEANA BISNAR MAUTE, SBN 290573
 3 JBisnarMaute@gibsondunn.com
 JESSICA S. OU, SBN 280534
 4 JOu@gibsondunn.com
 1881 Page Mill Road
 5 Palo Alto, California 94304
 Telephone: (650) 849-5300
 6 Facsimile: (650) 849-5333

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

11 Attorneys for Defendant
 FACEBOOK, INC.

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

16 MATTHEW CAMPBELL, MICHAEL
 HURLEY, and DAVID SHADPOUR, on behalf
 17 of themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC.,

21 Defendant.

Case No. C 13-05996 PJH

CLASS ACTION

**JOINT STIPULATION AND [~~PROPOSED~~]
 ORDER SETTING BRIEFING SCHEDULE
 AND HEARING DATE FOR DEFENDANT
 FACEBOOK, INC.'S MOTION TO
 DISMISS PLAINTIFFS' CONSOLIDATED
 AMENDED COMPLAINT**

The Honorable Phyllis J. Hamilton

1 WHEREAS, on April 25, 2014, Plaintiffs filed their Consolidated Amended Class Action
2 Complaint (“Complaint”) (Dkt. No. 25);

3 WHEREAS, the current deadline for Defendant Facebook, Inc. (“Facebook”) to respond to
4 the Complaint is June 9, 2014 (45 days from the date Plaintiffs filed the Complaint) (Dkt. No. 17);

5 WHEREAS, Facebook plans to file a Motion to Dismiss the Complaint (“Motion”);

6 WHEREAS, the Parties have met and conferred regarding a briefing schedule and hearing
7 date for Facebook’s Motion, and respectfully request, pursuant to Civil L.R. 6-2, that the Court enter
8 the schedule set forth below, which provides the Parties adequate time for briefing and takes into
9 account summer travel schedules;

10 WHEREAS, this case was filed in December 2013, no schedule has been entered, and the
11 Parties’ requested briefing schedule and hearing date would not prejudice the interests of the Parties
12 or the Court;

13 NOW, THEREFORE, pursuant to Civil L.R. 6-2, and subject to the approval of the Court, the
14 Parties hereby stipulate and request that the Court enter the following briefing schedule for
15 Facebook’s Motion to Dismiss:

- 16 1. Facebook’s Motion to Dismiss shall be filed and served no later than **June 17, 2014.**
- 17 2. Plaintiffs’ Opposition shall be filed and served no later than **July 30, 2014.**
- 18 3. Facebook’s Reply shall be filed and served no later than **August 28, 2014.**
- 19 4. Facebook’s Motion to Dismiss shall be heard on **September 17, 2014 at 9:00 a.m.**

20 The Parties have requested no previous modifications to the briefing schedule for the Motion.

21
22 Respectfully submitted,

23 DATED: June 6, 2014

GIBSON, DUNN & CRUTCHER LLP

24
25 By: _____/s/
JOSHUA A. JESSEN

26
27 Attorneys for Defendant Facebook, Inc.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: June 6, 2014

LIEFF CABRASER HEIMANN & BERNSTEIN

By: _____/s/_____
MICHAEL W. SOBOL

Attorneys for Plaintiffs

ATTORNEY ATTESTATION

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

DATED: June 6, 2014

GIBSON, DUNN & CRUTCHER LLP

By: _____/s/_____
JOSHUA A. JESSEN

Attorneys for Defendant Facebook, Inc.

[PROPOSED] ORDER

Having considered the Parties' Stipulation, and good cause appearing, the Court hereby GRANTS the Parties' stipulation. It is HEREBY ORDERED that:

- 1. Facebook's Motion to Dismiss shall be filed and served no later than **June 17, 2014.**
- 2. Plaintiffs' Opposition shall be filed and served no later than **July 30, 2014.**
- 3. Facebook's Reply shall be filed and served no later than **August 28, 2014.**
- 4. Facebook's Motion to Dismiss shall be heard on **September 17, 2014 at 9:00 a.m.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 9, 2014

The Hon. Phyllis J. Hamilton
 United States District Court Judge

