

1 Margret M. Caruso (SBN 243473)
 Cheryl A. Galvin (SBN 252262)
 2 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 555 Twin Dolphin Drive, 5th Floor
 3 Redwood Shores, CA 94065
 Telephone: (650) 801-5000
 4 Facsimile: (650) 801-5100

5 Attorneys for Defendant
 GOOGLE INC.

6 Andrew D. Skale (SBN 211096)
 askale@mintz.com
 Ben L. Wagner (SBN 243594)
 bwagner@mintz.com
 Justin S. Nahama (SBN 281087)
 jsnahama@mintz.com
 9 MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO P.C.
 10 3580 Carmel Mountain Road, Suite 300
 San Diego, CA 92130
 Telephone: (858) 314-1500
 11 Facsimile: (858) 314-1501

12 Attorneys for Plaintiff
 13 HANGINOUT, INC.

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 15 UNITED STATES DISTRICT COURT
 16 SOUTHERN DISTRICT OF CALIFORNIA
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18 HANGINOUT, INC., a Delaware
 corporation,
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 Plaintiff,
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 vs.
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 22 GOOGLE, INC., a Delaware
 corporation,
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 Defendant.

Case No. 3:13-cv-02811-AJB-NLS
**JOINT MOTION FOR
 MODIFICATION OF CASE
 SCHEDULE**

1 WHEREAS, Google Inc. (“Defendant”) served its First Request for the
2 Production of Documents on Hanginout, Inc. (“Plaintiff”) on August 15, 2014;

3 WHEREAS, Defendant intends to file an early summary judgment motion
4 addressing a discrete issue that it contends has the potential to be case dispositive,
5 and has diligently pursued discovery on that, and other issues;

6 WHEREAS, Plaintiff is still in the process of completing its document
7 production and does not expect to complete its production until at least December
8 2014;

9 WHEREAS, Google contends the current outstanding discovery it seeks may
10 limit the amount of discovery time, motion practice, and expense necessary should an
11 early summary judgment by Defendant be successful;

12 WHEREAS, Hanginout and Google agree that discovery should be conducted
13 with an eye towards efficiency;

14 WHEREAS, Google takes the position that, given the current state of
15 discovery, insufficient time remains before the current discovery cut-off dates for the
16 parties to complete initial summary judgment briefing, participate in a hearing, and
17 receive an order on that motion in time to obviate the need to complete all remaining
18 discovery, including expert discovery, which would be necessary if Defendant’s early
19 summary judgment motion is not granted;

20 WHEREAS, the parties do not seek to alter the deadlines for the mandatory
21 settlement conference, pretrial disclosures or the pretrial conference;

22 WHEREAS, the parties have not previously requested a continuance for any of
23 the below dates;

24 NOW THEREFORE, THE PARTIES JOINTLY MOVE and respectfully
25 request that the case deadlines for fact and expert discovery and pretrial motions be
26 modified as follows:
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Dated: November 25, 2014

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/Margret M. Caruso
Margret M. Caruso

Attorneys for Defendant
GOOGLE INC.

Dated: November 25, 2014

MINTZ LEVIN COHN FERRIS GLOVSKY
AND POPEO PC

By: /s/ Ben L. Wagner
Ben L. Wagner

Attorneys for Plaintiff
HANGINOUT, INC.

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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Ben Wagner, counsel for Plaintiff Hanginout, Inc., and that Mr. Wagner’s authorization has been obtained to affix his electronic signature to this document.

Dated: November 25, 2014

By /s/Margret M. Caruso
Margret M. Caruso

Attorneys for Defendant
GOOGLE INC.