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11					
12	Attorneys for Plaintiff				
13	HANGINOUT, INC.				
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15	5 UNITED STATES DISTRICT COURT				
16	SOUTHERN DISTRICT OF CALIFORNIA				
17					
18	corporation.				
19	Plaintiff, JOINT MOTION FOR MODIFICATION OF CASE				
20	0 vs.				
21	GOOGLE, INC., a Delaware				
22	² corporation,				
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24					
25 26					
20		-AJB-NLS			
		ockets.Justia.c			
26 27 28	7 8 Case No. 3:13-cv-02811-				

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

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

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

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

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

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

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

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

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

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1	Current Schedule		
2	Completion of fact discovery: March 20, 2015		
3	Designation of opening experts:	April 3, 2015	
4	Service of opening expert reports:	May 18, 2015	
5	Designation of rebuttal experts:	April 17, 2015	
6	Service of rebuttal expert reports:	June 1, 2015	
7	Completion of expert discovery: July 17, 2015		
8	Filing of pretrial motions:	August 17, 2015	
9			
10	Proposed Schedule		
11	Completion of fact discovery:	May 8, 2015	
12	Designation of opening experts: May 29, 2015		
13	Service of opening expert reports: June 29, 2015		
14	Designation of rebuttal experts:	July 20, 2015	
15	Service of rebuttal expert reports:	July 27, 2015	
16	Completion of expert discovery:	August 24, 2015	
17	Filing of pretrial motions: September 14, 2015		
18			
19	Dates to Remain Unchanged		
20	Mandatory settlement conference	October 14, 2015	
21	Comply with FRCP 26(a)(3)	December 1, 2015	
22	Meet and take action under LR 16.1(f)(4)	December 8, 2015	
23	Plaintiff's counsel provide pre-trial order	December 15, 2015	
24	File Proposed Final Pretrial Conf. Order	December 22, 2015	
25	Final Pretrial Conference	January 8, 2016	
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		Case No. 3:13-cv-02	

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2	Dated: November 25, 2014	OUINN EMANUFI, UROUHART &		
3		QUINN EMANUEL URQUHART & SULLIVAN, LLP		
4		By: /s/Margret M. Caruso		
5		By: / <u>s/Margret M. Caruso</u> Margret M. Caruso		
6 7		Attorneys for Defendant GOOGLE INC.		
8				
9	Dated: November 25, 2014	MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO PC		
10		By <u>/s/ Ben L. Wagner</u>		
11		By <u>Ast Ben L. Wagner</u> Ben L. Wagner		
12		Attorneys for Plaintiff		
13		HANGINOUT, INC.		
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		Case No. 3:13-cv-02811-AJB-NLS		

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1	SIGNATURE CERTIFICATION		
2	Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative		
3	Policies and Procedures Manual, I hereby certify that the content of this document is		
4	acceptable to Ben Wagner, counsel for Plaintiff Hanginout, Inc., and that Mr.		
5	Wagner's authorization has been obtained to affix his electronic signature to this		
6	document.		
7			
8	Dated: November 25, 2014	By <u>/s/Margret M. Caruso</u> Margret M. Caruso	
9		Margiet M. Caruso	
10		Attornava for Defendant	
11		Attorneys for Defendant GOOGLE INC.	
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	4	Case No. 3:13-cv-02811-AJB-NLS	