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Attorneys for Defendants Rimini Street, Inc.,  
 and Seth Ravin

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 ORACLE USA, INC.; a Colorado  
4 corporation; ORACLE AMERICA, INC.; a  
5 Delaware corporation; and ORACLE  
INTERNATIONAL CORPORATION, a  
California corporation,

6 Plaintiffs,

7 v.

8 RIMINI STREET, INC., a Nevada  
9 corporation; and SETH RAVIN, an  
individual,

10 Defendants.

CASE NO. 2:10-cv-0106-LRH-VCF

**JOINT STIPULATION TO MODIFY  
SCHEDULE FOR CERTAIN POST-  
INJUNCTION PROCEEDINGS**

11  
12 Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp.  
13 (together, "Oracle") and Defendant Rimini Street, Inc. and Seth Ravin (together, "Rimini";  
14 collectively, "Parties") jointly submit this Stipulation and [Proposed] Order.

15 WHEREAS, on November 22, 2019, the Court entered a minute order setting certain  
16 deadlines in this case, ECF No. 1289;

17 WHEREAS, due to the COVID-19 pandemic, the Parties stipulated to, and the Court  
18 ordered, an amended schedule extending existing deadlines by six weeks and setting the  
19 deadline for the close of expert discovery to May 8, 2020, the deadline for an OSC motion to  
20 May 27, 2020, the deadline for an OSC opposition to June 17, 2020, and the deadline for an  
21 OSC reply to July 1, 2020, ECF No. 1322;

22 WHEREAS the Parties further stipulated to "monitor the COVID-19 situation and to  
23 promptly advise the Court regarding the need for any further adjustments to the schedule," id.;

24 WHEREAS subsequent to the Parties' stipulation, the Governors of both California and  
25 Nevada extended shelter-in-place orders through April (in the case of Nevada) or until further  
26 notice (in the case of California), see Declaration of Emergency Directive 010 Stay at Home  
27 Order, Gov. Steve Sisolak (Mar. 31, 2020) (available at [http://gov.nv.gov/News/  
28 Emergency\\_Orders/2020/2020-03-31\\_-\\_COVID-19\\_Declaration\\_of\\_Emergency\\_Directive](http://gov.nv.gov/News/Emergency_Orders/2020/2020-03-31_-_COVID-19_Declaration_of_Emergency_Directive)

1 \_010\_-\_Stay\_at\_Home\_Order/) Executive Order N-33-20, Gov. Gavin Newsom (Mar. 19,  
2 2020) (available at <https://covid19.ca.gov/img/Executive-Order-N-33-20.pdf>);

3 WHEREAS similar shelter-in-place orders are in effect in states where the Parties'  
4 experts reside, including North Carolina, Illinois, and Oregon;

5 WHEREAS the COVID-19 pandemic and related orders create significant concerns that  
6 in-person expert depositions in this matter can be held legally, safely, and efficiently in May  
7 2020;

8 WHEREAS, the Parties agree that a further extension of the schedule is appropriate but  
9 disagree about how to address certain issues should social distancing continue substantially into  
10 the summer months;

11 WHEREAS, the Parties agree to further meet-and-confer concerning such issues, such  
12 as whether and how to implement alternatives to in-person expert depositions, in light of  
13 developments over the next several weeks;

14 WHEREAS the Parties continue to agree to monitor the COVID-19 situation, and to  
15 promptly advise the Court regarding the need for any further adjustments to the schedule or  
16 procedures in this case; and

17 THEREFORE, the Parties stipulate, and request that the Court order, that the deadlines  
18 in this case be reset as follows:

Event	Current Deadline	Proposed new deadline
Close of expert discovery	May 8, 2020	June 5, 2020
OSC motion due	May 27, 2020	June 24, 2020
OSC opposition due	June 17, 2020	July 15, 2020
OSC reply due	July 1, 2020	July 29, 2020

22 Dated: April 14, 2020

Dated: April 14, 2020

23 MORGAN, LEWIS & BOCKIUS LLP

GIBSON, DUNN & CRUTCHER LLP

24  
25 By: /s/ John A. Polito  
John A. Polito

By: /s/ Eric D. Vandavelde  
Eric D. Vandavelde

26 Attorneys for Plaintiffs Oracle USA, Inc.,  
27 Oracle America, Inc., and Oracle  
International Corporation

Attorneys for Defendants Rimini Street, Inc.,  
and Seth Ravin

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**ATTESTATION OF FILER**

The signatories to this document are Eric D. Vandavelde and me, and I have obtained his concurrence to file this document on his behalf.

Dated: April 14, 2020

MORGAN, LEWIS & BOCKIUS LLP

By:                                 /s/ John A. Polito                                  
  John A. Polito

Attorneys for Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation



1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 ORACLE USA, INC.; a Colorado corporation;  
4 ORACLE AMERICA, INC.; a Delaware  
5 corporation; and ORACLE INTERNATIONAL  
6 CORPORATION, a California corporation,

7 Plaintiffs,

8 v.

9 RIMINI STREET, INC., a Nevada corporation;  
10 and SETH RAVIN, an individual,

11 Defendants.

Case No 2:10-cv-0106-LRH-VCF

**ORDER RE: JOINT  
STIPULATION TO MODIFY  
SCHEDULE FOR CERTAIN  
POST-INJUNCTION  
PROCEEDINGS**

12 **ORDER**

13 **IT IS ORDERED** that the deadlines for post-injunction proceedings are reset as  
14 follows:

15

Event	Current Deadline	Proposed new deadline
Close of expert discovery	May 8, 2020	June 5, 2020
OSC motion due	May 27, 2020	June 24, 2020
OSC opposition due	June 17, 2020	July 15, 2020
OSC reply due	July 1, 2020	July 29, 2020

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19  
20 **IT IS SO ORDERED:**

21  
22 

23  
24 Hon. Cam Ferenbach  
United States Magistrate Judge

25 Dated: April 15, 2020