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Attorney for Defendant
GOOGLE LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

21 RUMBLE, INC.,
22 Plaintiff,
23 v.
24 GOOGLE LLC and DOES 1-10,
25 inclusive,
26 Defendants.

Case No. 4:21-cv-00229-HSG

**STIPULATION RE REVISED
PROPOSED CASE SCHEDULING
ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.

27 Pursuant to the Court's Minute Order [Dkt. 60], counsel for the parties have
28 met, conferred and agreed upon a Revised Proposed Case Scheduling Order as set

1 forth below.

2 The parties, through counsel, hereby stipulate to entry by the Court of the
3 concurrently-filed Revised Proposed Case Scheduling Order, and respectfully
4 request that the Court enter it as jointly proposed.

	Event	Jointly Proposed Date¹	Court Ordered Date
5			
6			
7	1 Deadline for Defendant to file its Answer to the First Amended Complaint	September 9, 2022	
8			
9	2 Fact Discovery commences	September 9, 2022	
10			
11	3 Deadline for the Parties to Submit a Proposed Protective Order or Submit Dispute to Court per Joint Submission	September 19, 2022	
12			
13			
14	4 Deadline for the Parties to Submit a Proposed ESI Order or Submit Dispute to Court per Joint Submission	September 19, 2022	
15			
16			
17	5 Deadline for the Parties to Submit a Proposed Remote Deposition Protocol Order or Submit Dispute to Court per Joint Submission	September 19, 2022	
18			
19			
20	6 Deadline to amend pleadings or join additional parties as of right	October 21, 2022 [Friday]	
21			
22	7 Deadline to Complete Fact Discovery (subject to any additional discovery allowed by Court in response to Motion to Compel filed at least 30 days prior)	December 15, 2023 [Friday]	
23			
24			

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27 ¹ If any of these proposed dates become unworkable as the litigation progresses, the parties will meet and confer on any scheduling complications in an attempt to reach agreement.
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1	8	Deadline for Parties to Serve Disclosures for Expert Witnesses and Expert Reports	January 26, 2024 [Friday]	
2				
3	9	Deadline for Parties to Serve Rebuttal Expert Reports (Replies not allowed without leave of Court for good cause)	March 15, 2024 [Friday]	
4				
5				
6	10	Deadline to Complete Expert Discovery (subject to any additional discovery allowed by Court in response to Motion to Compel)	May 17, 2024 [Friday]	
7				
8				
9	11	Deadline to File Dispositive and/or <i>Daubert</i> Motions	June 14, 2024 [Friday]	
10				
11				
12	12	Deadline to File Oppositions to Dispositive and/or <i>Daubert</i> Motions	July 26, 2024 [Friday]	
13				
14	13	Deadline to File Replies in Support of Dispositive and/or <i>Daubert</i> Motions	August 30, 2024 [Friday]	
15				
16	14	Pretrial Meet & Confer of Counsel Per Court's Civil Pretrial and Trial Standing Order ("PT&T Order")	To be determined once PreTrial and Trial dates set	
17				
18	15	Exchange of "Evidence" as specified in the PT&T Order	To be determined once PreTrial and Trial dates set	
19				
20	16	Serve Objections to Evidence	To be determined once PreTrial and Trial dates set	
21				
22				
23	17	File Joint Pretrial Statement and Proposed Order addressing all matters per PT&T Order	To be determined once PreTrial and Trial dates set	
24				
25	18	Meet & Confer re Motions in Limine, Jury Instructions, Voir Dire, Statement of the Case and Verdict Form(s) per PT&T Order	To be determined once PreTrial and Trial dates set	
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19	File Motions in Limine	To be determined once PreTrial and Trial dates set	
20	File Oppositions to Motions in Limine	To be determined once PreTrial and Trial dates set	
21	Hearing on Motions in Limine and Objections to Evidence at PreTrial Conference or other date the Court may set (per PT&T Order)	To be set by Court	
22	Meet & Confer re stipulations to admissibility, authenticity and foundation re Exhibits per PT&T Order	To be determined once PreTrial and Trial dates set	
23	File Trial Brief (not required, not longer than 15 pages if filed)	At least 10 days before trial	
24	Final Pretrial Conference	Parties suggest one month after the Court rules on any and all dispositive motion(s).	
25	Trial	Parties suggest trial begin November 4, 2024 [Monday]	

SO STIPULATED AND AGREED.

Dated: September 9, 2022

Respectfully Submitted,
 BURKE, WILLIAMS & SORENSEN, LLP
 By: /s/ Robert W. Dickerson Jr.
 Robert W. Dickerson, Jr.
 Attorneys for Plaintiff
 RUMBLE, INC.

[signatures continued next page]

1 Dated: September 9, 2022

CADWALADER, WICKERSHAM &
TAFT LLP

2
3 By: /s/ Jack G. Stern

4 Jack G. Stern
Admitted Pro Hac Vice

5 Attorneys for Plaintiff
6 RUMBLE, INC.

7 Dated: September 9, 2022

WILLIAMS & CONNOLLY LLP

8
9 By: /s/ John E. Schmidlein

John E. Schmidlein

10 Attorneys for Defendant
11 GOOGLE LLC

12
13
14 **ATTESTATION**

15 I, Robert W. Dickerson, Jr., am the ECF User whose ID and password are
16 being used to file this document. In compliance with Civil L.R. 5-1(h)(3), I hereby
17 attest that all counsel have concurred in this filing.
18

19 /s/ Robert W. Dickerson, Jr.