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6 Take-Two Interactive Software, Inc.

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 TAKE-TWO INTERACTIVE SOFTWARE,
INC.,

12 Plaintiff,

13 v.
14

15 ANGELO PAPENHOFF, a/k/a AAP, an
individual; THEO MORRA, an individual;
16 ERAY ORÇUNUS, an individual; ADRIAN
GRABER, an individual; DOE 1 a/k/a ASH R.
and ASH 735, an individual; and DOES 2
17 through 10, inclusive,

18 Defendants.
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CASE NO. 3:21-CV-6831-TSH

The Honorable Thomas S. Hixson

**JOINT STIPULATED REQUEST FOR
AN ORDER CHANGING DATE**

[Declaration of Karin Pagnanelli and
[Proposed] Order filed concurrently herewith]

1 **I. STIPULATION**

2 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Take-Two Interactive Software, Inc.
3 (“Take-Two” or “Plaintiff”) and Defendants Angelo Papenhoff, Theo Morra, Eray Orçunus, and
4 Adrian Graber (collectively, the “Parties”) hereby stipulate for leave to change the date of the Rule
5 16 scheduling conference.

6 The Complaint in this action was filed on September 2, 2021. ECF 1. Defendants filed an
7 Answer on November 12, 2021. ECF 24. The Rule 16 scheduling conference is currently
8 scheduled for December 2, 2021, and the Joint Rule 26 Report is due on November 25, 2021,
9 which is Thanksgiving day. ECF 7.

10 Because counsel for the Parties plan to be out of the office during the holidays (and one
11 counsel will be on paternity leave), the Parties seek a brief continuance of the Rule 16 scheduling
12 conference by a little more than a month, until January 23, 2022. *See* Declaration of Karin
13 Pagnanelli. This extension will move the due date for the Joint Rule 26 report to January 16,
14 2022, after the holidays.

15 The Parties agree that none of them will be prejudiced by this continuance. This is the
16 first request for an extension, and the Court has not yet set a schedule or any deadlines. *Id.* at ¶6.

17 **II. CONCLUSION**

18 Therefore, the Parties respectfully request that the Rule 16 scheduling conference be
19 continued from December 2, 2021 to January 23, 2022, and that the Rule 26 Joint Report be due
20 no later than January 13, 2022.

21 DATED: November 18, 2021

Respectfully Submitted,

22 KARIN G. PAGNANELLI
23 MITCHELL SILBERBERG & KNUPP LLP

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25 By: /s/ Karin G. Pagnanelli

26 Karin G. Pagnanelli
27 Attorneys for Plaintiff
Take-Two Interactive Software, Inc.

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DATED: November 18, 2021

ERIN K. RUSSELL
THE RUSSELL FIRM

By: /s/ Erin K. Russell
Erin K. Russell
Attorneys for Defendants
Angelo Papenhoff, Theo Morra, Eray Orçunus,
Adrian Graber

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Attestation Regarding Signatures-Local Rule 5-1(i)(3)

I, Karin G. Pagnanelli, attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: November 18, 2021

/s/ Karin G. Pagnanelli
Karin G. Pagnanelli