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Take-Two Interactive Software, Inc.
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 TAKE-TWO INTERACTIVE SOFTWARE,
INC.,

12 Plaintiff,

13 v.
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15 ANGELO PAPENHOFF, a/k/a AAP, an
individual; THEO MORRA, an individual;
ERAY ORÇUNUS, an individual; ADRIAN
16 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

The Honorable Thomas S. Hixson

**DECLARATION OF KARIN G.
PAGNANELLI IN SUPPORT OF JOINT
STIPULATED REQUEST FOR AN
ORDER CHANGING DATE**

[Joint Stipulated Request and [Proposed]
Order filed concurrently herewith]

1 I, Karin G. Pagnanelli, declare as follows:

2 1. I am an attorney-at-law, duly licensed to practice law in the State of California. I
3 am, through my Professional Corporation, a partner with the law firm of Mitchell Silberberg &
4 Knupp LLP (“MSK”), counsel of record for Plaintiff Take-Two Interactive Software, Inc. (“Take-
5 Two” or “Plaintiff”) in this action. I make this declaration in support of the Parties’ Joint
6 Stipulated Request for an Order Changing Date. I have personal knowledge of the following facts
7 and, if called and sworn as a witness, could and would competently testify thereto.

8 2. The Joint Rule 26 report is due on November 25, 2021 – Thanksgiving day. ECF
9 7. The initial scheduling conference is scheduled for December 2, 2021. *Id.*

10 3. Because it is allowed under the COVID protocols this year, counsel for the Take-
11 Two intends to take time off of work during the Thanksgiving, Christmas and Hanukah holidays.
12 Additionally, one of the counsel for Take-Two, Mark Humphrey will be unavailable for much of
13 December and early January because he is expecting his first child.

14 4. Counsel for Defendants also intends to take time off for the holidays.

15 5. Counsel proposes rescheduling the initial scheduling conference to January 20,
16 2022, which would set January 13, 2022 as the last day to file the Rule 26 report.

17 6. The Court has not set any deadlines in this case, other than setting the date for the
18 initial status conference.

19 7. The Parties agree that none of them will be prejudiced.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct.

22 Executed on this 18th day of November, 2021, at Huntington Beach, California.

23 /s/ Karin G. Pagnanelli
24 Karin G. Pagnanelli

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