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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Lead Case No. 3:23-cv-03417-VC

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE**

Judge: Hon. Vince Chhabria

Date: January 25, 2024

Time: 1:30 p.m.

Location: Videoconference

Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Michael Chabon, Ta-Nehisi Coates, Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Ayelet Waldman, and Jacqueline Woodson (collectively, “Plaintiffs”) and Defendant Meta Platforms, Inc. (collectively, the “Parties”) jointly stipulate and agree, subject to the Court’s approval, to the proposed schedule set forth in the attached **Exhibit A**, which is in the form of a proposed order.

WHEREAS, on January 12, 2024, the Court entered an order (“Order”) directing the Parties to file stipulated or competing proposed schedules “which culminate[] in a MSJ hearing in January/February 2025 with a CMC to be scheduled 2-3 weeks after.” (ECF No. 74);

WHEREAS, the Court’s order also indicates that the case schedule is to be further discussed at the upcoming January 25, 2024 motion hearing.

WHEREAS, the Parties met and conferred, and agreed on the proposed schedule attached herewith.

NOW THEREFORE, the Parties, through their undersigned counsel, hereby stipulate, agree and respectfully request that the Court enter an Order in the form attached hereto as **Exhibit A**, as may be modified and approved by the Court.

EXHIBIT A: PROPOSED SCHEDULE**PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS SO ORDERED:**

Event	Date
Document Production Begins	April 1, 2024
Date by which the parties, after good faith efforts, anticipate they will have substantially completed their production of documents in response to discovery that is not subject to any pending dispute	July 1, 2024
Close of Fact Discovery	September 30, 2024
Opening Expert Reports Due	October 11, 2024
Rebuttal Expert Reports Due	November 8, 2024
Reply Expert Reports Due	November 22, 2024
Close of Expert Discovery	December 20, 2024
Opening MSJ/Daubert Briefs Due	January 10, 2025
Opposition MSJ/Daubert Briefs Due	February 7, 2025
Reply MSJ/Daubert Briefs Due	February 21, 2025
Hearing on MSJ	Set by Court

Date: _____, 2024

 VINCE CHHABRIA
 United States District Judge

Dated: January 22, 2024

JOSEPH SAVERI LAW FIRM, LLP.

By: /s/ Joseph R. Saveri
 Joseph R. Saveri

Joseph R. Saveri (State Bar No. 130064)
Cadio Zirpoli (State Bar No. 179108)
Christopher K.L. Young (State Bar No. 318371)
Holden Benon (State Bar No. 325847)
Kathleen J. McMahon (State Bar No. 340007)
Travis Manfredi (State Bar No. 281779)

JOSEPH SAVERI LAW FIRM, LLP.

601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
Email: jsaveri@saverilawfirm.com
 czirpoli@saverilawfirm.com
 cyoung@saverilawfirm.com
 hbenon@saverilawfirm.com
 kcmahon@saverilawfirm.com
 tmanfredi@saverilawfirm.com

Matthew Butterick (State Bar No. 250953)
1920 Hillhurst Avenue, #406
Los Angeles, CA 90027
Telephone: (323) 968-2632
Facsimile: (415) 395-9940
Email: mb@buttericklaw.com

Counsel for Kadrey Plaintiffs and the Proposed Class

L.R. 5-1 SIGNATURE ATTESTATION

As the ECF user whose user ID and password are utilized in the filing of this document, I attest under penalty of perjury that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: January 22, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri