

1 DAVID H. KRAMER, SBN 168452  
Email: dkramer@wsgr.com  
2 MAURA L. REES, SBN 191698  
Email: mrees@wsgr.com  
3 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
4 650 Page Mill Road  
Palo Alto, CA 94304-1050  
5 Telephone: (650) 493-9300

6 ERIC P. TUTTLE, SBN 248440  
Email: eric.tuttle@wsgr.com  
7 WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
8 701 Fifth Avenue, Suite 5100  
Seattle, WA 98104-7036  
9 Telephone: (206) 883-2500

10 *Counsel for Defendant*

RYAN J. CLARKSON, SBN 257074  
Email: rclarkson@clarksonlawfirm.com  
YANA HART, SBN 306499  
Email: yhart@clarksonlawfirm.com  
TIARA AVANESS, SBN 343928  
Email: tavaness@clarksonlawfirm.com  
CLARKSON LAW FIRM, P.C.  
22525 Pacific Coast Highway  
Malibu, CA 90265  
Telephone: (213) 788-4050

TRACEY COWAN, SBN 250053  
Email: tcowan@clarksonlawfirm.com  
CLARKSON LAW FIRM, P.C.  
93 3rd Street, 2nd Floor  
San Francisco, CA 94103  
Telephone: (213) 788-4050

*Counsel for Plaintiffs and the Proposed Classes*

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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

16 JILL LEOVY, NICHOLAS GUILAK, )  
CAROLINA BARCOS, PAUL MARTIN, )  
17 MARILYN COUSART, ALESSANDRO DE LA )  
TORRE, VLADISLAV VASSILEV, JANE )  
18 DASCALOS, and minor G.R., individually, and )  
on behalf of all other similarly situated, )  
19 Plaintiffs, )  
20 v. )  
21 GOOGLE LLC, )  
22 Defendant. )  
23

CASE NO.: 3:23-cv-03440-AMO  
**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE CASE  
MANAGEMENT CONFERENCE  
AND HEARING ON DEFENDANT  
GOOGLE LLC'S MOTION TO  
DISMISS**

Judge: Hon. Araceli Martínez-Olguín

1 Defendant Google LLC and Plaintiffs Jill Leovy, Nicholas Guilak, Carolina Barcos, Paul  
2 Martin, Marilyn Cousart, Alessandro De La Torre, Vladisslav Vassilev, Jane Dascalos, and minor  
3 G.R. (collectively, “the Parties”), by and through their respective counsel of record, hereby  
4 stipulate as follows:

5 WHEREAS, Plaintiffs filed their First Amended Complaint on January 5, 2024 (ECF No.  
6 28);

7 WHEREAS, Defendant moved to dismiss the First Amended Complaint on February 9, 2024  
8 (ECF No. 33), Plaintiffs filed their opposition on March 15, 2024 (ECF No. 36), and Defendant filed  
9 its reply brief on April 5, 2024 (ECF No. 37);

10 WHEREAS, consistent with the Parties’ prior stipulation (ECF No. 31), the hearing on  
11 Defendant’s motion to dismiss was noticed for May 16, 2024 at 2 p.m. (ECF No. 33);

12 WHEREAS, the Parties stipulated in January that it would be more efficient and orderly for  
13 the Case Management Conference to take place after the hearing on the motion to dismiss (ECF No.  
14 31), and the Court accordingly ordered that the Case Management Conference would be continued  
15 to June 6, 2024 at 10 a.m. (or such other time as the Court may order at the hearing on the motion  
16 to dismiss) (ECF No. 32);

17 WHEREAS, on April 30, 2024, the Court continued the hearing on Defendant’s motion to  
18 dismiss from May 16, 2024 to August 22, 2024 at 2 p.m. (ECF No. 38);

19 WHEREAS, the Parties have agreed, subject to this Court’s approval, that the hearing on  
20 Defendant’s motion to dismiss should be continued by two weeks, from August 22, 2024 to  
21 September 5, 2024, to accommodate Defendant’s counsel’s unavailability;

22 WHEREAS, the Parties continue to agree that it would be most efficient and orderly for  
23 the Initial Case Management Conference to take place at or after the hearing on Defendant’s  
24 motion to dismiss;

25 WHEREAS, not all counsel are available on September 12, 2024, and the Court’s  
26 Scheduling Notes indicate that the Court is unavailable on September 19 and 26; and

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28

1 WHEREAS, the Parties defer to the preference of the Court on whether to hold the Case  
2 Management Conference on the same day as the hearing on Defendant's motion to dismiss or on  
3 the next available date (October 3, 2024);

4 NOW, THEREFORE, pursuant to Civil Local Rules 6-2 and 7-12, the Parties agree, subject  
5 to the approval of the Court, as follows:

- 6 1. the hearing on Defendant's motion to dismiss, currently scheduled for August 22, 2024  
7 at 2 p.m., shall be continued to September 5, 2024 at 2 p.m.;
- 8 2. the Initial Case Management Conference, currently scheduled for June 6, 2024 at 10  
9 a.m., shall be continued to ~~September 5, 2024~~ ~~October 3, 2024~~ at 10:00 a.m., or  
10 such other time as the Court may order at the hearing on the motion to dismiss;
- 11 3. the Parties' joint case management statement shall be filed no later than one week prior  
12 to the Case Management Conference; and
- 13 4. the Parties shall make their Rule 26(a) initial disclosures no later than one week prior  
14 to the Case Management Conference.



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Respectfully submitted,

Dated: May 14, 2024

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ David H. Kramer  
David H. Kramer  
dkramer@wsgr.com

*Counsel for Defendant*

Dated: May 14, 2024

CLARKSON LAW FIRM  
Professional Corporation

By: /s/ Yana Hart  
Yana Hart  
yhart@clarksonlawfirm.com

*Counsel for Plaintiffs and the Proposed Classes*

**SIGNATURE ATTESTATION**

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer  
David H. Kramer