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

In Re Mosaic LLM Litigation

Master File Case No.: 3:24-cv-01451-CRB
Consolidated with Case No. 3:24-cv-02653-CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
TO AMEND CASE SCHEDULE**

Pursuant to Civil L.R. 6-2, the Parties have agreed and stipulated to an extension of the deadlines for expert disclosures and expert discovery, along with the corresponding case deadlines, and respectfully request that the Court adjust the case schedule as follows:

Event	Current Deadline	New Stipulated Deadline
Deadline for Opening Expert Reports on Fair Use and Plaintiffs' Copyright Claims	February 23, 2026	March 16, 2026
Deadline for Rebuttal Expert Reports	March 27, 2026	April 17, 2026
Close of Expert Discovery	May 11, 2026	June 1, 2026
Deadline for Summary Judgment Motions on Fair Use and Plaintiffs' Copyright Claims	June 8, 2026	June 29, 2026
Deadline for Oppositions to Summary Judgment Motions	July 23, 2026	August 13, 2026
Deadline for Replies to Summary Judgment Motions	August 24, 2026	September 14, 2026
Hearing on Summary Judgment Motions	To be set by the Court	October 30, 2026 at 10:00 a.m.

This requested schedule extension is based on Plaintiffs' request for more time to review Defendants' recent document productions. On January 5, 2026, the Court ordered Defendants "to produce 'All Documents and Communications Concerning Your acquisition, use, storage, retention, distribution, and deletion' of the RedPajama – Books and Books3 datasets." Dkt. 242 at 4. Pursuant to the Court's Order, Defendants produced an additional ten terabytes of data on January 30, 2026. Plaintiffs requested additional time to allow their technical experts sufficient time to analyze and review this data produced by Defendants. Plaintiffs' technical expert estimated that reviewing 400 gigabytes of data would entail an estimated six hours to complete in addition to follow up review, requiring an additional three weeks of analysis to review the ten terabytes produced.

The Parties have previously stipulated to extend all case deadlines three times, which the

1 Court ordered on February 19, 2025, April 23, 2025, and September 4, 2025. *See* Dkts. 82, 111
2 and 172. The Parties previously stipulated to a limited adjustment of the expert discovery deadlines
3 to account for the holiday season, which the Court ordered on December 31, 2025. Dkt. 240.
4 Plaintiffs moved to amend the case schedule on November 18, 2025, Dkt. 191, and Defendants
5 contested Plaintiffs' motion, Dkt. 198. The Court granted Plaintiffs' motion to amend the case
6 schedule on December 31, 2025, setting the current case schedule. Dkt. 238.

7 This extension is without prejudice to, and does not bear upon, the Parties' respective
8 positions and arguments regarding whether discovery disputes may be presented to the Court.
9 Defendants maintain that this extension applies solely to the deadlines set forth in this stipulation
10 and does not authorize Plaintiffs to conduct any additional fact discovery or raise new disputes
11 related to fact discovery. Defendants maintain their right to object to any use of this extension to
12 raise new discovery issues. Plaintiffs do not seek to reset the fact discovery deadlines but reserve
13 their rights under the Federal Rules, the Local Rules, and the Court's Orders to raise issues with
14 Defendants' discovery for good cause.

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17 **IT IS SO STIPULATED.**

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19 Dated: February 13, 2026

Respectfully submitted,

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 18, 2026


The Honorable Charles R. Breyer
United States District Court Judge