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25 *Attorneys for Defendants Automattic Inc. and*
26 *Matthew Charles Mullenweg*

27 **IN THE UNITED STATES DISTRICT COURT**
28 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

29 WPENGINE, INC., a Delaware corporation,
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31 Plaintiff,
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33 vs.
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35 AUTOMATTIC INC., a Delaware
36 corporation; and MATTHEW CHARLES
37 MULLENWEG, an individual,
38
39 Defendants.

Case No. 3:24-cv-06917-AMO

**NOTICE OF SUBMISSION OF
PROPOSED STIPULATED
PRELIMINARY INJUNCTION SHARED
WITH PLAINTIFF PURSUANT TO ECF
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1 As requested by the Court, Defendants Automattic Inc. and Matthew Charles Mullenweg
2 (together, “Defendants”) prepared the draft stipulated preliminary injunction attached as Exhibit A
3 and shared it with Plaintiff WPEngine, Inc. (“Plaintiff”) as Defendants’ proposal for resolving
4 Plaintiff’s motion for preliminary injunction. The parties met and conferred and could not reach
5 agreement on a stipulated preliminary injunction.

6 If the Court determines to enter a preliminary injunction (and Defendants maintain that a
7 preliminary injunction should not be issued for the reasons set forth in its Opposition to the Motion
8 for Preliminary Injunction), then Defendants believe that paragraphs (a) – (e) of their proposed
9 stipulated injunction provide the appropriate narrower scope of relief that the Court should order in
10 any preliminary injunction it may issue.

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13 Dated: December 2, 2024

Respectfully submitted,

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By: /s/Michael M. Maddigan

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