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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 WPENGINE, INC., a Delaware corporation,
14 Plaintiff,
15 v.
16 AUTOMATTIC INC., a Delaware corporation;
and MATTHEW CHARLES MULLENWEG,
17 an individual,
18 Defendants.

Case No. 3:24-cv-06917-AMO
**DECLARATION OF ROSEMARIE T. RING
IN SUPPORT OF JOINT STIPULATION
AND [PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE**

DECLARATION OF ROSEMARIE T. RING

I, Rosemarie T. Ring, declare as follows:

1. I am a member in good standing of the California Bar and am admitted to practice before this Court. I am a partner in the law firm of Gibson, Dunn, & Crutcher LLP, which has been retained by Defendants Automattic Inc. and Matthew Charles Mullenweg (collectively, “Defendants”) to represent them in the above-captioned action. I submit this declaration in support of the Joint Stipulation filed concurrently herewith seeking an extension of time to file responses and replies on the Motion to Intervene (Dkt. 70) and Motion for Contempt (Dkt. 71)(collectively, “Motions”) filed by non-party Michael Willman on January 13, 2025. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently to these facts.

2. On January 13, 2025, Mr. Willman filed the Motions and noticed them for hearing on February 23, 2025 (Dkts. 70& 71).

3. On January 21, 2025, the Court continued the hearing on the Motions to June 5, 2025 (Dkt. 74).

4. Responses to the Motions are due by January 27, 2025, and replies in support of the Motions are due by February 3, 2025 (Dkts. 70 & 71).

5. On January 22, 2025, my law firm was retained to represent Defendants in this matter. While attorneys at my firm and I have been working diligently to transition into the case, and will continue to do so, it is not feasible to adequately prepare responses to the Motions by the current deadline of January 27, 2025.

6. In light of the foregoing, and because the Motions are set for hearing five months from now, on June 5, 2025, so that a short extension of the briefing schedule will not prejudice any of the litigants in this case or delay resolution of the Motions, I contacted Mr. Willman by telephone on January 23, 2025, to request that he stipulate to a short extension of the briefing schedule, extending the deadline for responses until February 19, 2025, and extending the deadline for any replies to March 5, 2025. Mr. Willman agreed and the parties have therefore stipulated, subject to approval by the Court, to the following briefing schedule for the Motions:

