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1 2 3 4 5 6	ROSEMARIE T. RING, SBN 220769 rring@gibsondunn.com JOSEPH R. ROSE, SBN 27902 jrose@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP One Embarcadero Center San Francisco, CA 94111-3715 Telephone: 415.393.8200 Facsimile: 415.801.7358 Counsel for Defendants Automattic Inc. and	MICHAEL H. DORE, SBN 227442 mdore@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 333 South Grand Avenue Los Angeles, CA 90071-3197 Telephone: 213.229.7000 Facsimile: 213.229.6652
7 8	Matthew Charles Mullenweg	
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10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12	SAN FRANCISCO DIVISION	
13	WPENGINE, INC., a Delaware corporation,	Case No. 3:24-cv-06917-AMO
14 15	Plaintiff, v.	DECLARATION OF ROSEMARIE T. RING IN SUPPORT OF JOINT STIPULATION AND [PROPOSED] ORDER REGARDING
16 17	AUTOMATTIC INC., a Delaware corporation; and MATTHEW CHARLES MULLENWEG, an individual,	BRIEFING SCHEDULE
18	Defendants.	
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DECLARATION OF ROSEMARIE T. RING

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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:

- Responses to Non-Party Michael Willman's Motion to Intervene (Dkt. 70) and Motion for Contempt (Dkt. 71) shall be filed on or before February 19, 2025.
- Replies in Support of Non-Party Michael Willman's Motion to Intervene (Dkt. 70) and
 Motion for Contempt (Dkt. 71) shall be filed on or before March 5, 2025.
- 7. This stipulated briefing schedule for the Motions will ensure that briefing will be complete three months before the June 5, 2025 hearing date, and does not affect any other date previously ordered by the Court or have any impact on the case schedule.
- 8. No requests have previously been made to extend the briefing schedule on the Motions. Plaintiff WPEngine and Defendants previously stipulated to a short extension (from October 28, 2024 to October 30, 2024) for Defendants to respond to the initial Complaint filed by Plaintiff in this matter. The Court also previously granted Plaintiff's motion to shorten the time to brief and hear Plaintiff's motion for a preliminary injunction, and, pursuant to a stipulation, extended the time for Defendants to respond to Plaintiff's Amended Complaint and established an associated briefing schedule.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed at San Francisco, California on this 24th day of January, 2025.

DATED: January 24, 2025 GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rosemarie T. Ring
Rosemarie T. Ring