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KELLER ROHRBACK L.L.P.
Benjamin Gould (SBN 250630)
bgould@kellerrohrback.com
1201 Third Avenue, Suite 3400
Seattle, Washington 98101
Telephone: +1.206.623.1900

BUTTERICK LAW PC
Matthew Butterick (SBN 250953)
mb@buttericklaw.com
1920 Hillhurst Avenue, #406
Los Angeles, California 90027
Telephone: +1.323.968.2632

Attorneys for Plaintiffs Hendrix and Roberson

LATHAM & WATKINS LLP
Andrew M. Gass (Bar No. 259694)
andrew.gass@lw.com
Joseph R. Wetzel (Bar No. 238008)
joe.wetzel@lw.com
Melanie M. Blunski (Bar No. 234264)
melanie.blunski@lw.com
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: +1.415.391.0600

Elana Nightingale Dawson (*Pro hac vice*)
elana.nightingaledawson@lw.com
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
Telephone: +1.202.637.2200

Attorneys for Defendant Apple Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

GRADY HENDRIX & JENNIFER
ROBERSON,

Individual and Representative Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 4:25-cv-07558-YGR

**JOINT STIPULATION TO EXTEND
DEFENDANT APPLE INC.'S TIME TO
RESPOND TO COMPLAINT**

Judge: Hon. Yvonne Gonzalez Rogers

Complaint Filed: September 5, 2025

1 Pursuant to Civil Local Rule 6-1(a), which allows the parties to stipulate, without Court
2 order, to extend the time to respond to a complaint, Plaintiffs Grady Hendrix and Jennifer Roberson
3 (together “Plaintiffs”) and Defendant Apple Inc. (“Apple”) (collectively, the “Parties”), through
4 their undersigned counsel, hereby stipulate and declare as follows:

5 WHEREAS, Plaintiffs filed their complaint (the “Complaint”) on September 5, 2025 (Dkt.
6 No. 1);

7 WHEREAS, Apple was served in this matter on or about September 10, 2025 (Dkt. No.
8 10);

9 WHEREAS, on September 19, 2025, the Parties stipulated to extend Apple’s time to
10 answer or otherwise respond to the Complaint from October 1, 2025, to October 31, 2025, Dkt.
11 No. 19;

12 WHEREAS, on October 9, 2025, Plaintiffs Susana Martinez-Conde and Stephen L.
13 Macknik (“*Martinez-Conde* Plaintiffs”) filed suit against Apple in the Northern District of
14 California, *see Martinez-Conde v. Apple Inc.*, No. 3:25-cv-08695;

15 WHEREAS, on October 14, 2025, the *Martinez-Conde* Plaintiffs filed an Administrative
16 Motion To Consider Whether Cases Should Be Related Under Civil Local Rule 3-12, Dkt. No. 33,
17 (“Related Cases Motion”), in which they took the position that the *Martinez-Conde* action should
18 be related to this case;

19 WHEREAS, on October 16, 2025, Apple filed a statement in support of the *Martinez-*
20 *Conde* Plaintiffs’ Related Cases Motion, Dkt. No. 34;

21 WHEREAS, on October 17, 2025, the *Hendrix* Plaintiffs filed a statement in support of the
22 *Martinez-Conde* Plaintiffs’ Related Cases Motion, Dkt. No. 35;

23 WHEREAS, the Parties are discussing potential consolidation of the *Hendrix* and
24 *Martinez-Conde* actions;

25 WHEREAS, in light of the Parties’ discussions regarding consolidation, Apple has
26 requested, and Plaintiffs have consented to, additional time for Apple to answer or otherwise
27 respond to the Complaint;

28 WHEREAS, the Parties’ proposed extension will not impact any other pending deadlines;

1 WHEREAS, the Parties agree that an extension of Apple’s time to file a responsive
2 pleading is reasonable and serves the interests of judicial economy and efficiency;

3 THEREFORE, the Parties, by and through their respective undersigned counsel, HEREBY
4 STIPULATE AND AGREE, as follows:

5 Defendant Apple Inc.’s time to file a responsive pleading to the Complaint shall be, and is
6 extended by 35 days to December 5, 2025.

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Dated: October 20, 2025

KELLER ROHRBACK L.L.P.

By: /s/ Benjamin Gould

Benjamin Gould (SBN 250630)
Derek W. Loeser, *Pro Hac Vice*
Chris N. Ryder, *Pro Hac Vice*
William K. Dreher, *Pro Hac Vice*
Elizabeth W. Tarbell, *Pro Hac Vice*
1201 Third Avenue, Suite 3400
Seattle, Washington 98101-3268
(206) 623-1900
Fax (206) 623-3384
bgould@kellerrohrback.com
dloeser@kellerrohrback.com
cryder@kellerrohrback.com
wdreher@kellerrohrback.com
etarbell@kellerrohrback.com

BUTTERICK LAW PC

Matthew Butterick (SBN 250953)
1920 Hillhurst Avenue, #406
Los Angeles, California 90027
mb@buttericklaw.com

Attorneys for Plaintiffs

Dated: October 20, 2025

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Andrew M. Gass

Andrew M. Gass (Bar No. 259694)
andrew.gass@lw.com
Joseph R. Wetzel (Bar No. 238008)
joe.wetzel@lw.com
Melanie M. Blunschi (Bar No. 234264)
melanie.blunschi@lw.com
505 Montgomery Street, Suite 2000
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Elana Nightingale Dawson (*Pro hac vice*)
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Attorneys for Defendant Apple Inc.

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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing **JOINT STIPULATION TO EXTEND DEFENDANT APPLE INC.’S TIME TO RESPOND TO COMPLAINT**. Pursuant to L.R. 5-1(i)(3) regarding signatures, I, Andrew M. Gass, attest that each of the other Signatories have concurred in the filing of the document.

Dated: October 20, 2025

/s/ Andrew M. Gass
Andrew M. Gass