



21st Floor  
1251 Avenue of the Americas  
New York, NY 10020-1104

Elizabeth A. McNamara  
(212) 489-8230 tel  
(212) 489-8340 fax

lizmcnamara@dwt.com

April 5, 2023

**VIA ECF**

Hon. John G. Koeltl  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

APPLICATION GRANTED  
SO ORDERED

4/7/23   
John G. Koeltl, U.S.D.J.

Re: *Hachette Book Group, Inc., et al. v. Internet Archive, et al.*, 20-cv-04160-JGK

Dear Judge Koeltl:

The parties write jointly in response to the Court’s March 24, 2023 order granting Plaintiffs’ motion for summary judgment, denying Defendant’s motion for summary judgment, and ordering the parties to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case no later than April 7, 2023.

The parties have engaged in multiple constructive conversations directed towards our shared goal of submitting a joint procedure to the Court but have not yet reached a resolution. In light of these continued discussions and given the religious holidays this week, the parties request a brief extension of the current deadline.

Accordingly, the parties respectfully request that the Court issue an order extending the deadline to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case by seven days, to **April 14, 2023**.

We appreciate the Court’s time and attention to this matter.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

MORRISON & FOERSTER LLP

/s/ Elizabeth A. McNamara  
Elizabeth A. McNamara  
Linda Steinman  
John M. Browning  
Jesse Feitel  
Carl Mazurek  
1251 Avenue of the Americas, 21st Floor  
New York, NY 10020  
Phone: (212) 489-8230

/s/ Joseph C. Gratz  
Joseph C. Gratz (*Pro Hac Vice*)  
Jessica E. Lanier (*Pro Hac Vice*)  
Aditya V. Kamdar (*Pro Hac Vice*)  
Annie A. Lee (*Pro Hac Vice*)  
425 Market Street  
San Francisco, CA 94105  
Phone: (415) 268-7000  
Email: JGratz@mofocom

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Email: lizmcnamara@dwt.com  
lindasteinman@dwt.com  
jackbrowning@dwt.com  
jessefeitel@dwt.com  
carlmazurek@dwt.com

JLanier@mofocom  
AKamdar@mofocom  
AnnieLee@mofocom

OPPENHEIM + ZEBRAK, LLP

Matthew J. Oppenheim  
Scott A. Zebrak  
Danae Tinelli  
4530 Wisconsin Avenue, NW, 5th Floor  
Washington, DC 20016  
Phone: (202) 480-2999  
Email: matt@oandzlaw.com  
scott@oandzlaw.com  
danae@oandzlaw.com

*Attorneys for Plaintiffs*

ELECTRONIC FRONTIER FOUNDATION

Corynne McSherry (*Pro Hac Vice*)  
Kit Walsh (*Pro Hac Vice*)  
Cara Gagliano (*Pro Hac Vice*)  
815 Eddy Street  
San Francisco, CA 94109  
Phone: (415) 436-9333  
Email: corynne@eff.org  
kit@eff.org  
cara@eff.org

*Attorneys for Defendant*