



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

Elizabeth McNamara  
212-603-6437 tel  
212-489-8340 fax

lizmcnamara@dwt.com

APPLICATION GRANTED  
SO ORDERED

A handwritten signature in black ink, appearing to read 'John G. Koeltl'.

June 22, 2023

6/22/23

John G. Koeltl, U.S.D.J.

VIA ECF

The Honorable John G. Koeltl  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 14A  
New York, NY 10007-1312

Re: *Hachette Book Group, Inc., et al. v. Internet Archive*, Case No. 1:20-CV-04160-JGK

Your Honor:

The parties write jointly in connection with their upcoming June 23 deadline to submit a proposal for the appropriate procedure to determine the judgment to be entered in this case.

The parties have continued to engage in constructive conversations directed towards our shared goal of submitting a joint procedure to the Court. The parties are currently engaged in drafting a consent judgment subject to a right of appeal, as well as other documents reflecting the parties' anticipated agreements, and expect to present to the Court a proposed procedure to determine the judgment to be entered in this case in the next several weeks.

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 to **July 14, 2023**.

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

Respectfully submitted,

MORRISON & FOERSTER LLP

DAVIS WRIGHT TREMAINE LLP

/s/ Joseph C. Gratz

/s/ Elizabeth A. McNamara

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@mofo.com

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

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JLanier@mofocom  
AKamdar@mofocom  
AnnieLee@mofocom

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

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*

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*

cc: All Counsel (via ECF)