

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Plaintiff,

-against-

JOHN DOE AKA “KEVIN MCFREE,”

Defendant.

Civil Action No. 7:21-cv-04155

STIPULATION AND ~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties as follows:

1. Plaintiff will notify Defendant once it has delivered a hard copy of a subpoena to Google, specifying the date of that delivery.
2. Defendant will serve any motion to quash (“Motion”) by email, with a supporting memorandum not to exceed 30 pages, within 60 days after Google has received a hard copy of the subpoena.
3. Plaintiff’s memorandum in opposition to the Motion, with a memorandum not to exceed 30 pages. will be served by email within 60 days after Defendant serves the Motion.
4. Defendant’s reply memorandum, with a memorandum not to exceed 15 pages, will be served by email within 30 days after Plaintiff serves its opposition to the Motion.
5. The parties will provide the Court with courtesy copies of their motion papers at the time they are served.
6. Defendant will file all papers associated with the Motion within seven days after the Motion has been fully briefed, provided, that if plaintiff’s opposition includes voluminous exhibits, native format exhibits, exhibits in excess of the PACER 10mb file size limit, or other

documents that will require special filing procedures, such as documents that plaintiff contends may only be filed under seal, then defendant need file only the defendant's own papers, and plaintiff will file its papers once the motion and reply have been filed.

Dated: April 6, 2022

COWAN, LIEBOIWTZ & LATMAN, P.C.

/s/ Eric J. Shimanoff

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"Kevin McFree"*

IT IS SO ORDERED this 6th day of April, 2022.



The Honorable Cathy Seibel
United States District Judge