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19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

23 ALEX BERENSON,
24 Plaintiff,
25 v.
26 TWITTER, INC.,
27 Defendant.

Case No. 3:21-cv-09818-WHA

STIPULATION EXTENDING DISCOVERY DEADLINES

Civ. L.R. 6-1, 6-2, 7-12

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Alex Berenson and Defendant
2 Twitter, Inc. (together the “Parties”) hereby stipulate to extend discovery deadlines for both Parties
3 as follows:

4 **WHEREAS**, on May 4, 2022, the Court issued an order appointing Harold Peter Smith as
5 mediator in this case;

6 **WHEREAS**, the Parties have conducted two separate mediation sessions in this case on
7 May 27, 2022 and again on May 31, 2022;

8 **WHEREAS**, the Order set various deadlines for discovery, ordering that (1) Plaintiff shall
9 produce certain documents by June 6, 2022; (2) Defendant shall produce certain documents by June
10 20, 2022; (3) Defendant may depose Plaintiff by June 27, 2022; (4) Plaintiff, following his
11 deposition, may depose two of Defendant’s current or former employees by July 14, 2022; and (5)
12 the parties shall propose further discovery or summary judgment practice by July 21, 2022;

13 **WHEREAS**, to facilitate further settlement discussions, the parties agree that a modest
14 extension of the discovery deadlines would facilitate the most efficient use of their resources and
15 the Court’s, including by permitting the parties to focus their efforts on resolution;

16 **WHEREAS**, the Order permitted counsel to “agree in a stipulation promptly filed herein to
17 modest adjustments of the foregoing deadlines and obligations”;

18 **WHEREAS**, Civil Local Rule 6-1(b) permits the parties to file a stipulation seeking a court
19 order modifying the Order’s discovery deadline;

20 **WHEREAS**, the parties propose no changes to the substance or sequence of the discovery
21 specified in the Order;

22 **NOW, THEREFORE**, the parties stipulate that the deadlines for the parties to conduct
23 discovery specified by the Order are extended as follows:

- 24 • Plaintiff will produce the documents specified in paragraph 4 of the Order by **June 16,**
25 **2022.**
- 26 • Defendant will produce the documents specified in paragraph 5 of the Order by **June**
27 **30, 2022.**
- 28 • Defendant may take Plaintiff’s deposition by **July 14, 2022.**

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- After Plaintiff’s deposition, Plaintiff may take depositions of two current or former employees of Defendant as specified in the Order by **August 5, 2022**.
- The parties shall propose a further phase of discovery and/or a schedule for summary judgment motions by **August 12, 2022**.

IT IS SO STIPULATED.

Dated: June 2, 2022

COOLEY LLP

By: /s/ Kyle Wong
 Kyle Wong
 Attorneys for Defendant

Dated: June 2, 2022

ENVISAGE LAW

By: /s/ James R. Lawrence, III
 James R. Lawrence, III
 Attorneys for Plaintiff

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

I, Kyle Wong, attest that concurrence in the filing of the foregoing document has been obtained from the other signatory.

Executed on June 2, 2022, in San Francisco, California.

/s/ Kyle Wong
 Kyle Wong

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 2, 2022



Hon. William Alsup
UNITED STATES DISTRICT JUDGE