UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware corporation,

Defendant.

Case No. 3:23-cv-03417-VC

STIPULATION AND ~~[PROPOSED]~~ ORDER REGARDING CASE SCHEDULE PROPOSALS

Pursuant to Civil Local Rule 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher Farnsworth (collectively, the "Plaintiffs"); and Defendant Meta Platforms, Inc. ("Meta") (together, the "Parties"), by and through their respective counsel, stipulate to the following:

1. The Parties participated in a Case Management Conference before the Presiding Judge on July 11, 2025.
2. At that Conference, the Parties and the Court discussed presenting remaining discovery disputes to Magistrate Judge Hixson that originate from the Court's prior orders on

additional discovery (as raised in Dkt. No. 487*; see also* Dkt. Nos. 470; 500) before proceeding with supplemental expert reports and summary judgment briefing.

3. On July 14, the Court issued a Minute Entry directing the Parties to submit stipulated or competing proposed case schedules by July 18.

4. The Parties have discussed further and agree that it would be procedurally beneficial to fully resolve the remaining discovery disputes before setting court-ordered deadlines for serving supplemental expert reports and filing summary judgment briefs.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Meta, as represented by their undersigned counsel and subject to the approval of the Court, that:

1. The Parties shall present joint discovery letter briefing to Judge Hixson on outstanding discovery disputes pursuant to the following schedule:
    - July 23 - Plaintiffs serve their portion of discovery letter brief to Meta by 12 PM PT.
    - July 30 - Meta serves its response to Plaintiffs by 12 PM PT.
    - July 31 - Plaintiffs serve their reply to Meta by 12 PM PT.
    - July 31 – The Parties will file their joint letter brief by 11:59 PM PT.
2. The Parties shall file their stipulated or competing case schedules within 7 days of the final resolution of those discovery disputes, including any Motions for Relief from Non-Dispositive Pretrial Orders of a Magistrate Judge, if applicable.

Dated: July 18, 2025

By: /s/ *Phillip Morton*

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Respectfully Submitted,

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Counsel for Individual and Representative Plaintiffs and the Proposed Class

~~PROPOSED~~ ORDER

Pursuant to the stipulation of the Parties, **IT IS SO ORDERED.**

DATED: July 28, 2025

HON. VINCE CHHABRIA
United States District Judge