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 ECF NO. 627

Hon. Vince Chhabria

Pursuant to N.D. Cal. 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. On September 24, 2025, Magistrate Judge Hixson issued an order regarding Plaintiffs' motion regarding privilege issues relating to a challenged document. ECF No. 627.

2. Plaintiffs have requested information regarding allegations made in a separate lawsuit, which Plaintiffs contend may bear on issues in this case related to the ruling set forth in ECF No. 627. Meta is in the process of investigating these allegations and will be providing an update to Plaintiffs. In any event,

Meta does not agree that the allegations from the separate lawsuit bear on the ruling in ECF No. 627.

3. Given Plaintiffs' contention that the allegations from the separate lawsuit may bear on issues in this case related to the ruling in ECF No. 627, and notwithstanding Meta's disagreement with that position, the Parties agree that it is in both Parties' interest for Meta to provide an update as to its initial investigations into these allegations before Plaintiffs seek reconsideration before Judge Hixson in accordance with Local Rule 7-9 and his Discovery Standing Order, or a file a motion for relief under Local Rule 72-2, relating to ECF No. 627. Thus, the Parties agree that the deadline for Plaintiffs to raise any motion under Local Rules 7-9 or 72-2 shall be held in abeyance pending a further update from the Parties.

Dated: September 30, 2025

By: /s/ *Phillip Morton*

Bobby A. Ghajar
Colette Ani Ghazarian
COOLEY LLP
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Telephone: (310) 883-6400
Facsimile: (310) 883-6500
Email: bghajar@cooley.com
cghazarian@cooley.com

Mark R. Weinstein
Matthew Brigham
Elizabeth Lee Stameshkin
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
Telephone: 650-843-5000
Facsimile: 650-849-7400
Email: mweinstein@cooley.com
Email: mbrigham@cooley.com
Email: lstameshkin@cooley.com

Kathleen R. Hartnett
Judd D. Lauter
COOLEY LLP
3 Embarcadero Center, 20th Floor
San Francisco, CA 94111-4004
Telephone: (415) 693-2071
Facsimile: (415) 693-2222
Email: khartnett@cooley.com

Phillip Morton
COOLEY LLP
1299 Pennsylvania Avenue, NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Facsimile: (202) 842-7899
Email: pmorton@cooley.com

Angela Dunning
CLEARY GOTTLIEB STEEN &
HAMILTON LLP
1841 Page Mill Road, Suite 250
Palo Alto, CA 94304-1248
Telephone: (650) 815-4131
Email: adunning@cgsh.com

Attorneys for Defendant
META PLATFORMS, INC.

Respectfully submitted,

By: /s/ *Jay Schuffenhauer*

BOIES SCHILLER FLEXNER LLP
David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
Margaux Poueymirou (SBN 356000)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com
mpoueymirou@bsfllp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

Counsel for Individual and Representative Plaintiffs and the Proposed Class

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ *Jay Schuffenhauer*
Jay Schuffenhauer

PROPOSED ORDER

Pursuant to the stipulation of the Parties, the Court grants the Parties' request to toll the deadline for Plaintiffs to seek relief under Local Rule 7-9 and Local Rule 72-2 with respect to ECF No. 627.

IT IS SO ORDERED.

DATED: _____ _____

HON. VINCE CHHABRIA
United States District Judge