[counsel listed on signature page]

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-TSH **JOINT STIPULATION AND [PROPOSED] ORDER TO AMEND STIPULATED PROTECTIVE ORDER** Judge: Hon. Vince Chhabria

Pursuant to N.D. Cal. Civil Local Rule 7-12 and Federal Rule of Evidence 502(d), Plaintiffs Richard Kadrey, Sarah Silverman, Eleven Eleven O' Clock Corporation, Christopher Golden, Daring Greatly Corporation, Ta-Nehisi Coates, BCP Literary, Inc., Junot Díaz, Andrew Sean Greer, David Henry Hwang, Matthew Klam, Laura Lippman, Rachel Louise Snyder, Jacqueline Woodson, Lysa TerKeurst, and Christopher Farnsworth (collectively, "Plaintiffs"); and Defendant Meta Platforms, Inc. ("Meta") (together, the "Parties"), by and through their respective counsel, stipulate to the following:

WHEREAS on January 25, 2024, the Court entered a Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (FRCP 26(c)(1)(G), L.R. 7-1) (Dkt. 90) (the "Current Protective Order") to govern discovery in this matter;

WHEREAS Section 13 of the Current Protective Order provides: "The Parties and Court expect to

enter a separate Order under Fed. R. Evid. 502(d) that governs the production of documents protected from discovery.";

WHEREAS the Parties have not yet entered such a separate order and now wish to amend the Current Protective Order to include protections pursuant to Fed. R. Evid. 502(d) for documents produced on or after the date this Order is entered;

WHEREAS the Parties have amended Section 13 of the Current Protective Order in the stipulated amended protective order attached hereto as Exhibit A to provide: "Pursuant to Federal Rule of Evidence 502(d), the production of attorney-client privileged or attorney work-product protected documents, electronically stored information or information (collectively "Protected Documents"), whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d). The provisions of Rule 502(b) do not apply," and to provide a process for resolving the inadvertent production of Protected Documents;

WHEREAS the Court previously approved language almost identical to the above-quoted language for inclusion in the protective order for the related case of *Entrepreneur Media LLC v. Meta Platforms Inc.*, No. 3:25-cv-09579-VC, Dkt. 49;

THE PARTIES HEREBY STIPULATE AND AGREE that the stipulated amended protective order attached hereto as Exhibit A shall be entered.

Dated: July 27, 2026

By: */s/ Karen L. Dunn*
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Respectfully submitted,

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Attorneys for Defendant Meta Platforms, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____ _____

HON. THOMAS S. HIXSON
United States Magistrate Judge

ECF ATTESTATION

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

/s/ Karen L. Dunn
Karen L. Dunn

Counsel for Defendant