[*counsel on signature page*]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*, Plaintiffs, v. META PLATFORMS, INC., Defendant.	Case No. 3:23-cv-03417-VC-TSH **STIPULATION AND PROPOSED [ORDER] TO EXTEND EXPERT REPORT DEADLINES** Judge: Hon. Vince Chhabria
ENTREPRENEUR MEDIA, LLC, Plaintiff, v. META PLATFORMS, INC., Defendant.	Case No. 3:25-cv-09579-VC **STIPULATION AND PROPOSED [ORDER] TO EXTEND EXPERT REPORT DEADLINES** Judge: Hon. Vince Chhabria
COGNELLA, INC., Plaintiff, v. META PLATFORMS, INC., Defendant.	Case No. 3:26-cv-04053-VC **STIPULATION AND PROPOSED [ORDER] TO EXTEND EXPERT REPORT DEADLINES** Judge: Hon. Vince Chhabria
CAMBRONNE, INC. et al., Plaintiff, v. META PLATFORMS, INC., Defendant.	Case No. 3:26-cv-03725-VC **STIPULATION AND PROPOSED [ORDER] TO EXTEND EXPERT REPORT DEADLINES** Judge: Hon. Vince Chhabria

CHICKEN SOUP FOR THE SOUL, LLC,

Plaintiff,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:26-cv-02333-VC

STIPULATION AND [PROPOSED] ORDER TO EXTEND EXPERT REPORT DEADLINES

Judge: Hon. Vince Chhabria

Pursuant to N.D. Cal. Civil Local Rules 6-2 and 7-12 and the Court's Civil Standing Order, 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, Eleven Eleven O' Clock Corporation, BCP Literary, Inc., and Daring Greatly Corporation (collectively, "Kadrey"), Entrepreneur Media, LLC ("Entrepreneur"), Chicken Soup for the Soul, LLC ("Chicken Soup"), Cambronne, Inc., Matthew Sacks, Jane Adams, Philip Shishkin, and Lisa Barretta (collectively, "Cambronne"), Cognella, Inc. ("Cognella") and Defendant Meta Platforms, Inc. ("Meta") (together, the "Parties"), the Parties in the above-captioned matters, by and through their respective undersigned counsel, stipulate to the following:

RECITALS

WHEREAS, pursuant to the Court's scheduling orders in each of the above-captioned matters, the current deadline for opening expert reports is September 18, 2026;

WHEREAS, on September 11, 2026, Entrepreneur, Chicken Soup, Cambronne, Cognella and Meta filed a number of discovery motions that are currently pending before Judge Hixson;

WHEREAS, Entrepreneur, Chicken Soup, Cambronne, Cognella and Meta are engaged in other ongoing supplementations of discovery that have not been the subject of discovery motions;

WHEREAS, Entrepreneur, Chicken Soup, Cambronne, Cognella and Meta agree that a short, two-week extension of time for opening expert reports and corresponding shifts to a subset of dates following opening expert reports will allow the parties to present a more developed expert discovery record to the Court;

WHEREAS, Kadrey, which was not a party to the above-referenced discovery motions, does not object to a corresponding extension to the same dates in the *Kadrey* matter;

WHEREAS, the proposed schedule adjustments will not change the date of submission of the final two summary judgment briefs or the Court's previously scheduled date for hearing dispositive motions;

WHEREAS, other than extensions of time to respond to the Complaint, no extensions of time have been entered in the *Entrepreneur*, *Chicken Soup*, *Cambronne*, and *Cognella* matters.

WHEREAS, several extensions of time have been requested and granted in the *Kadrey* matter, including Dkt. 211; Dkt. 258; Dkt. 406; Dkt. 628; and Dkt. 666;

WHEREAS, the Court has not stated in any of the above matters that no further extensions will be granted;

NOW, THEREFORE, subject to the approval of the Court, the parties stipulate and agree as follows:

STIPULATION

1. The deadlines for expert reports, the close of expert discovery and Summary Judgment Briefs 1 and 2 are adjusted as follows.

Event	Current Deadline	Proposed Deadline
Deadline for Opening Expert Reports	9/18/2026	10/2/2026
Deadline for Rebuttal Expert Reports	10/16/2026	10/30/2026

Event	Current Deadline	Proposed Deadline
Deadline for Reply Expert Reports	10/30/2026	11/13/2026
Close of Expert Discovery	11/20/2026	12/2/2026
Deadline for Summary Judgment Brief 1 (Plaintiff's Opening Brief)	12/11/2026	12/16/2026
Deadline for Summary Judgment Brief 2 (Defendant's Opening Brief & Opposition)	1/11/2027	1/12/2027
Deadline for Summary Judgment Brief 3 (Plaintiff's Opposition & Reply)	1/29/2027	1/29/2027 (unchanged)
Deadline for Summary Judgment Brief 4 (Defendant's Reply)	2/12/2027	2/12/2027 (unchanged)
Last Day to Hear Dispositive Motions	2/25/2027	2/25/2027 (unchanged)

Dated: September 14, 2026

By: /s/ *Maxwell V. Pritt*

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 Richard Kadrey, et al.

By: */s/ Phillip E. Morton*
Phillip E. Morton

Karen L. Dunn (*pro hac vice*)
Jessica E. Phillips (*pro hac vice*)
Kyle N. Smith (*pro hac vice*)
DUNN ISAACSON RHEE LLP
401 9th Street NW
Washington, DC 20004
Email: kdunn@dirllp.com
jphillips@dirllp.com
ksmith@dirllp.com

Mark R. Weinstein
Elizabeth Lee Stameshkin
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304
mweinstein@cooley.com
lstameshkin@cooley.com

Bobby A. Ghajar
COOLEY LLP
1333 2nd Street, Suite 400
Santa Monica, CA 90401
Email: bghajar@cooley.com

Phillip E. Morton (*pro hac vice pending*)
COOLEY LLP
1299 Pennsylvania Avenue NW, Suite 700
Washington, DC 20004
Telephone: (202) 842-7800
Email: pmorton@cooley.com

Angela L. Dunning
CLEARY GOTTLIEB STEEN & HAMILTON LLP
151 University Avenue
Palo Alto, CA 94301-1632
Telephone: (650) 815-4131
Email: adunning@cgsh.com

Counsel for Defendant Meta Platforms, Inc.

By: */s/ Kyle Roche*
Elizabeth Brannen (SBN 226234)
ebrannen@stris.com
John Stokes (SBN 310847)
jstokes@stris.com
Lauren Martin (SBN 294367)
lmartin@stris.com
STRIS & MAHER LLP
17785 Center Court Dr N, Ste 600
Cerritos, CA 90703

Christopher M. Rigali (pro hac vice)
crigali@stris.com
Jacqueline Sahlberg (pro hac vice)
jsahlberg@stris.com
1717 K St NW Ste 900
Washington, DC 20006

FREEDMAN NORMAND FRIEDLAND LLP
Devin (Velvel) Freedman (pro hac vice forthcoming)
vel@fnf.law
Kyle Roche (pro hac vice forthcoming)
kroche@fnf.law
Alex Potter (pro hac vice forthcoming)
apotter@fnf.law
155 E. 44th Street, Ste 915
New York, NY 10017

Counsel for Plaintiffs Chicken Soup for the Soul, LLC, and Cognella, Inc., and the Cambronne Plaintiffs

By: */s/ Lee Linderman*
HUESTON HENNINGAN LLP
Moez M. Kaba
Michael M. Purpura
Lee Linderman
Stephanie Xiao
Tai Chien

NEWMEYER & DILLION LLP
Michael B. McClellan
Benjamin P. Pugh
Jason L. Morris
Harlye S. Carlton

Attorneys for Plaintiff ENTREPRENEUR MEDIA, LLC

ECF ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for the Parties in the above-captioned matters concur in the filing of this document.

/s/ Phillip E. Morton
Phillip E. Morton

PROPOSED ORDER

Pursuant to the stipulation of the Parties, the Court grants the Parties' request to amend the Case Schedule. The schedule for expert reports and summary judgment briefing shall be amended as follows:

Event	Current Deadline	Proposed Deadline
Deadline for Opening Expert Reports	9/18/2026	10/2/2026
Deadline for Rebuttal Expert Reports	10/16/2026	10/30/2026
Deadline for Reply Expert Reports	10/30/2026	11/13/2026
Close of Expert Discovery	11/20/2026	12/2/2026
Deadline for Summary Judgment Brief 1 (Plaintiff's Opening Brief)	12/11/2026	12/16/2026
Deadline for Summary Judgment Brief 2 (Defendant's Opening Brief & Opposition)	1/11/2027	1/12/2027
Deadline for Summary Judgment Brief 3 (Plaintiff's Opposition & Reply)	1/29/2027	1/29/2027 (unchanged)
Deadline for Summary Judgment Brief 4 (Defendant's Reply)	2/12/2027	2/12/2027 (unchanged)
Last Day to Hear Dispositive Motions	2/25/2027	2/25/2027 (unchanged)

IT IS SO ORDERED.

DATED: _____

_____
HON. VINCE CHHABRIA
United States District Judge