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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 TWITTER, INC.,

15 Plaintiff,

16 v.

17 VOIP-PAL.COM, INC.

18 Defendant.
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Case No. 21-cv-09773-JD

**DECLARATION OF GENE W. LEE IN
SUPPORT OF TWITTER, INC.'S JOINT
STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
DEADLINES AND HEARING DATE FOR
VOIP-PAL'S MOTION TO DISMISS**

1 I, Gene W. Lee, declare as follows:

2 1. I am a licensed attorney with the law firm Perkins Coie LLP. I am lead counsel of
3 record for plaintiff Twitter, Inc., and I am admitted *pro hac vice* in this action. I have personal
4 knowledge of the matters stated in this declaration and would testify truthfully to them if called
5 upon to do so.

6 2. I make this declaration in support of the Parties' Joint Stipulation and [Proposed]
7 Order To Request Extension Of Briefing Deadlines And Hearing Date For VoIP-Pal's Motion To
8 Dismiss, pursuant to Civil Local Rules 6-1(b) and 6-2(a).

9 3. Twitter requests that the Court extend the deadline for Twitter's Opposition to VoIP-
10 Pal's Motion To Dismiss (ECF 25) by 14 days. VoIP-Pal agrees to this request provided that the
11 Court also extends the deadline for VoIP-Pal's Reply by 7 days. These extensions would give the
12 Parties sufficient time to fully consider and develop the issues and arguments for those briefs.

13 4. In addition, counsel for Twitter has a long-standing scheduling conflict with the
14 hearing date of March 24, 2022, the date that VoIP-Pal noticed for its Motion To Dismiss. Counsel
15 for Twitter has a family vacation and a professional conference planned during the week that
16 includes March 24, both of which involve travel.

17 5. The Parties previously stipulated to a 30-day extension of time for VoIP-Pal to
18 respond to the Complaint. ECF 10. The Parties have not requested, and the Court has not ordered,
19 any other time modifications in this case.

20 6. No other dates scheduled for this case will be affected by the proposed
21 modifications.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Dated: February 22, 2022

By: /s/ Gene Lee

24 Gene W. Lee

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