

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NETWORK-1 TECHNOLOGIES, INC.,

Plaintiff,

v.

GOOGLE LLC and YOUTUBE, LLC,

Defendants.

14 Civ. 2396 (PGG)

14 Civ. 9558 (PGG)

**JOINT STIPULATION TO MODIFY THE DEADLINE FOR
COMPLETION OF DEPOSITIONS OF FACT WITNESSES**

Plaintiff Network-1 Technologies, Inc. and Defendants Google LLC and YouTube, LLC, through their undersigned counsel, hereby stipulate, subject to approval by this Court, to modify the deadline for the completion of depositions of fact witnesses set forth in the January 17, 2019 Joint Proposed Civil Case Management Plan and Scheduling Order (“Scheduling Order,” Dkt. No. 137-1 ¶ 8.e).¹

WHEREAS, Plaintiff Network-1 and Defendants have completed the interim discovery deadlines set forth in sub-paragraphs a, b, c, d, and f of paragraph 8 of the Scheduling Order;

WHEREAS, Network-1 and Defendants agree to complete both party and non-party written discovery by September 30, 2019 (the date set forth in paragraph 7 of the Scheduling Order for the completion of fact discovery);

WHEREAS, because there are at least about ten fact depositions yet to be completed, most of which will require cross-country or international travel as well as the coordination of

¹ Citations to the docket refer to docket entries in Case No. 14 Civ. 2396 (PGG).

counsel's and witnesses' schedules, Network-1 and Defendants agree that it would be beneficial to extend the deadline to complete depositions of fact witnesses from September 30, 2019 (*see* Scheduling Order paragraph 8.e) to November 1, 2019;

WHEREAS, in accordance with paragraph 13 of the Scheduling Order, counsel for Network-1 and Defendants will meet face-to-face for at least one hour to discuss settlement no later than November 15, 2019;

WHEREAS, no other deadlines will be affected, including the expert discovery and dispositive motion deadlines set forth in paragraphs 12 and 14 of the Scheduling Order, respectively;

NOW THEREFORE, the parties hereby stipulate and agree as follows:

1. Network-1 and Defendants will complete both party and non-party written discovery by **September 30, 2019**;
2. Network-1 and Defendants will complete depositions of fact witnesses by **November 1, 2019**; and
3. Counsel for Network-1 and Defendants will meet face-to-face for at least one hour to discuss settlement no later than **November 15, 2019**.

SO STIPULATED.

Dated: September 12, 2019

Respectfully submitted,

RUSS, AUGUST & KABAT

BY: /s/ Amy E. Hayden

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*Attorneys for Google LLC and
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SO ORDERED.

Date: _____

Paul G. Gardephe
United States District Judge