

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).<sup>1</sup>

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

---

<sup>1</sup> 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

Marc A. Fenster (*pro hac vice*)  
Brian D. Ledahl (*pro hac vice*)  
Adam S. Hoffman (*pro hac vice*)  
Paul A. Kroeger (*pro hac vice*)  
Amy E. Hayden (*pro hac vice*)  
12424 Wilshire Blvd. 12<sup>th</sup> Floor  
Los Angeles, CA 90025  
Phone: (310) 826-7474  
Fax: (310) 826-6991  
mfenster@raklaw.com  
bledahl@raklaw.com  
ahoffman@raklaw.com  
pkroeger@raklaw.com  
ahayden@raklaw.com

Charles R. Macedo  
AMSTER, ROTHSTEIN &  
EBENSTEIN LLP  
90 Park Avenue  
New York, NY 10016  
Phone: (212) 336-8074  
Fax: (212) 336-8001  
cmacedo@arelaw.com

*Attorneys for Network-1  
Technologies, Inc.*

WILLIAMS & CONNOLLY LLP

BY: /s/ Samuel Bryant Davidoff


Samuel Bryant Davidoff  
650 Fifth Avenue, Suite 1500  
New York, NY 10022  
212-688-9224  
sdavidoff@wc.com

Bruce R. Genderson (*pro hac vice*)  
Kevin Hardy (*pro hac vice*)  
Andrew V. Trask  
725 Twelfth St., N.W.  
Washington, DC 20005  
Phone: (202) 434-5000  
Fax: (202) 434-5029  
bgenderson@wc.com  
khardy@wc.com  
atrask@wc.com

*Attorneys for Google LLC and  
YouTube, LLC*

SO ORDERED.

Date: Sept. 16, 2019

  
\_\_\_\_\_  
Paul G. Gardephe  
United States District Judge