

**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 EXPERT DISCOVERY DEADLINES**

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 expert discovery deadlines set forth in the October 21, 2019 Joint Proposed Civil Case Management Plan and Scheduling Order (Dkt. No. 189)<sup>1</sup> in order to permit sufficient time for the parties to finish source code review and to address issues remaining following the close of fact discovery.

WHEREAS, opening expert reports are currently due for service on November 25, 2019;

WHEREAS, rebuttal expert reports are currently due for service on January 17, 2020;

WHEREAS, the close of expert discovery is currently February 7, 2020;

WHEREAS, letters seeking leave to file dispositive motions are currently due on February 21, 2020, with opposition letters due February 28, 2020;

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

WHEREAS, the parties still need to complete the fact discovery-related tasks outlined above, necessitating additional time before expert discovery begins;

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

1. The parties may serve opening expert reports by **December 20, 2019**;
2. The parties may serve rebuttal expert reports by **February 14, 2020**;
3. Any application for leave to serve a reply expert report must be filed by **February 21, 2020**;
4. The parties must complete expert discovery, including depositions of experts, by **March 13, 2020**;
5. Any letter seeking leave to file dispositive motions must be filed by **March 27, 2020**, and any opposition letters must be filed by **April 3, 2020**.

SO STIPULATED.

Dated: November 13, 2019

Respectfully submitted,

RUSS, AUGUST & KABAT

BY: /s/ Brian D. Ledahl

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*Attorneys for Google LLC and  
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SO ORDERED.

Date: \_\_\_\_\_

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Paul G. Gardephe  
United States District Judge