

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)¹ 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;

¹ 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

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*)
Jacob R. Buczko (*pro hac vice*)
12424 Wilshire Blvd. 12th 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
Graham W. Safty (*pro hac vice*)
Sumeet P. Dang (*pro hac vice*)
725 Twelfth St. NW
Washington, DC 20005
Phone: (202) 434-5000
Fax: (202) 434-5029
bgenderson@wc.com
khardy@wc.com
atrask@wc.com
gsafty@wc.com
sdang@wc.com

*Attorneys for Google LLC and
YouTube, LLC*

SO ORDERED.

Date: Nov. 13, 2019

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