

**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-SN)

14 Civ. 9558 (PGG-SN)

**JOINT STIPULATION TO MODIFY THE DEADLINE FOR
THE CLOSE OF EXPERT DISCOVERY**

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 deadlines set forth in the October 21, 2019 Joint Proposed Civil Case Management Plan and Scheduling Order (Dkt. No. 189)¹ and the March 27, 2020 Joint Stipulation to Modify the Deadline for the Close of Expert Discovery (Dkt. No. 211).

WHEREAS, the close of expert discovery is currently June 30, 2020;

WHEREAS, numerous states and municipalities are under “stay at home” orders, including those in which at least some counsel of record and expert witnesses reside;

WHEREAS, as a result of the aforementioned situation, the parties have recently agreed to conduct expert depositions remotely by video;

WHEREAS, the parties agree that an extension of one month is necessary to coordinate and complete said depositions;

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

WHEREAS, the parties have a disagreement concerning the appropriate deadlines for submission of letters seeking leave to file dispositive motions and oppositions thereto and previously agreed to submit either a joint stipulation reflecting their agreement or a joint letter setting forth their respective positions on the issue for resolution by the Court;

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

1. The parties must complete expert discovery, including depositions of experts, by July 31, 2020;
2. The parties have not been able to resolve their disagreement concerning the appropriate deadlines for submission of letters seeking leave to file dispositive motions and oppositions thereto, and therefore shall submit a joint letter setting forth their respective positions on the issue for resolution by the Court no later than 45 days before the close of expert discovery.

SO STIPULATED.

Dated: May 26, 2020

Respectfully submitted,

RUSS, AUGUST & KABAT

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SO ORDERED.

Date: _____

Paul G. Gardephe
United States District Judge