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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE PLAID INC. PRIVACY LITIGATION

Master Docket No. 4:20-cv-03056-DMR

**JOINT STIPULATION AND PROPOSED
ORDER TO EXTEND PAGE LIMITS
PURSUANT TO CIVIL LOCAL RULE 7-12**

THIS DOCUMENT RELATES TO:

Hon. Donna M. Ryu

ALL ACTIONS

Action Filed: May 4, 2020

Trial Date: None Set

Pursuant to Civil Local Rule 7-12, Defendant Plaid Inc. (“Defendant”) and Plaintiffs Caroline Anderson, James Cottle, Rachel Curtis, David Evans, Logan Mitchell, Alexis Mullen, Jordan Sacks, Frederick Schoeneman, Gabriel Sotelo, Jeffrey Umali, Nicholas Yeomelakis, on behalf of themselves and all others similarly situated (“Plaintiffs”), by and through their counsel of record, respectfully submit this stipulation to seek extensions on the page limits applicable to the briefings on Defendant’s anticipated motion to dismiss Plaintiffs’ Consolidated Amended Complaint.

WHEREAS, certain Plaintiffs commenced this action by filing a Complaint on May 4, 2020, *see* Dkt. No. 1;

WHEREAS, certain Plaintiffs subsequently filed four additional lawsuits against Plaid, consisting of related allegations and claims;

WHEREAS, the Court granted the Parties’ stipulation to consolidate the five lawsuits (ECF No. 57);

WHEREAS, Plaintiffs filed a Consolidated Amended Complaint (“CAC”), asserting ten (10) claims for relief on behalf of alleged nationwide and California classes (ECF No. 61);

WHEREAS, Civil Local Rule 7-2(b) sets a 25-page limit for a memorandum in support of a motion to dismiss;

WHEREAS, Civil Local Rule 7-3(a) sets a 25-page limit for a memorandum in support of an opposition to a motion to dismiss;

WHEREAS, Civil Local Rule 7-3(c) sets a 15-page limit for a memorandum in support of a reply to an opposition to a motion to dismiss;

WHEREAS, no previous page limit modifications have been made in the case, whether by stipulation or Court order;

WHEREAS, the Parties have met and conferred about the subject matter of the stipulation;

WHEREAS, the Parties agree that the page limitations provided for in the Civil Local Rules are inadequate to fully address the factual allegations and causes of action set forth in the CAC, and that the Court will benefit from more thorough briefing by the Parties; and

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties in this action, pursuant to Civil Local Rule 7-12 that:

- Defendant's memorandum of points and authorities in support of its motion to dismiss shall be limited to 40 pages;
- Plaintiffs' memorandum of points and authorities in opposition to Defendant's motion to dismiss shall be limited to 45 pages; and
- Defendant's reply brief shall be limited to 20 pages, except in the case that Defendant's memorandum of points and authorities in support of its motion to dismiss is less than 40 pages, Defendant shall be permitted to extend its reply brief by the difference between the length of its memorandum of points and authorities in support of its motion to dismiss and 40 pages, but in no event will the reply brief exceed 25 pages.

In accordance with Civil Local Rule 5-1, the filer of this document hereby attests that the concurrence to the filing of this document has been obtained from the other signatory, below.

Dated: September 8, 2020

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Ethan D. Dettmer

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Attorneys for Plaintiffs and the Proposed Classes

[PROPOSED] ORDER

Having reviewed the above Joint Stipulation and Proposed Order To Extend Page Limits Pursuant To Civil Local Rule 7-12, PURSUANT TO STIPULATION, IT IS SO ORDERED that:

- Defendant's memorandum of points and authorities in support of its motion to dismiss shall be limited to 40 pages;
- Plaintiffs' memorandum of points and authorities in opposition to Defendant's motion to dismiss shall be limited to 45 pages; and
- Defendant's reply brief shall be limited to 20 pages, except in the case that Defendant's memorandum of points and authorities in support of its motion to dismiss is less than 40 pages, Defendant shall be permitted to extend its reply brief by the difference between the length of its memorandum of points and authorities in support of its motion to dismiss and 40 pages, but in no event will the reply brief exceed 25 pages.

IT IS SO ORDERED.

DATED: _____, 2020

THE HONORABLE DONNA M. RYU
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Ethan D. Dettmer, hereby certify that on September 8, 2020, I caused the foregoing Joint Stipulation and Proposed Order to Extend Page Limits Pursuant to Civil Local Rule 7-12 to be electronically filed via the Court's CM/ECF system. Notice of this filing will be served to all counsel of record by operation of the Court's electronic filing system.

/s/ Ethan D. Dettmer
Ethan D. Dettmer