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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

*In re Adobe Systems Inc. Privacy Litigation*

Lead Case No.: 5:13-CV-05226-LHK

**JOINT SETTLEMENT STATUS REPORT,  
STIPULATION, AND ~~PROPOSED~~ ORDER  
EXTENDING TIME TO FILE MOTION  
FOR SETTLEMENT APPROVAL**

The Honorable Lucy H. Koh

[Civil Local Rule 6-1(a)]

1 Plaintiffs Christina Halpain, Joseph Kar, Anne McGlynn, Christina Duke, Jacob McHenry,  
2 and Marcel Page (“Plaintiffs”) and Defendant Adobe Systems Incorporated (“Adobe” or  
3 “Defendant”) (collectively, “Parties”) hereby provide a brief status update to the Court.

4 As explained in the Parties’ February 11, 2015 Joint Settlement Status Report, the Parties  
5 have reached an agreement to settle this case. *See* Dkt. No. 75. On February 9, 2015, the Parties  
6 signed a Memorandum of Understanding that, if the Parties’ settlement is approved by the Court,  
7 would result in the dismissal of all claims. The Memorandum of Understanding provides for  
8 confirmatory discovery. The Parties anticipated and thus proposed that they would be able to  
9 finalize the settlement agreement and complete the confirmatory discovery and file settlement  
10 approval papers by April 30, 2015. *See* Dkt. No. 77 (Order setting April 30, 2015 as the deadline  
11 for Plaintiffs to file their motion for preliminary settlement approval).

12 Since their previous submission, the Parties have been working to finalize the settlement  
13 agreement based on the framework set out in their Memorandum of Understanding. While the  
14 Parties have made significant progress with respect to the formal settlement agreement and  
15 associated moving papers, finalizing the formal settlement agreement has been more difficult and  
16 time consuming than they initially anticipated. Thus, the Parties will not be able to complete the  
17 confirmatory discovery and prepare their final papers for the Court by April 30, 2015, but are  
18 confident that they will have completed everything by May 28, 2015.

19 In light of these developments, the Parties respectfully request that the Court extend the  
20 deadline to file their motion for settlement approval to May 28, 2015 to allow them to finalize the  
21 settlement agreement, complete confirmatory discovery, and motion drafting. The Parties also  
22 respectfully suggest that, accordingly, the Court may wish to continue the Case Management  
23 Conference currently on calendar for April 30, 2015, to a date after the motion to approve the  
24 settlement is filed.

25 Accordingly, the Parties hereby stipulate and agree as follows:

26 WHEREAS, the Parties previously anticipated a motion for preliminary settlement approval  
27 by April 30, 2015;

1 WHEREAS, despite diligent, good-faith efforts on all sides, the Parties will not be able to  
2 complete the confirmatory discovery and prepare their papers for the Court by April 30, 2015;

3 WHEREAS, the Parties believe that they need until May 28, 2015 to complete the related  
4 confirmatory discovery and brief a motion for settlement approval;

5 NOW, THEREFORE, IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1(a) and  
6 subject to the Court’s approval, that the Parties will complete their confirmatory discovery and  
7 Plaintiffs will move for settlement approval by May 28, 2015.

8 Dated: April 21, 2015

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11 By: /s/ Eric H. Gibbs  
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David M. Berger (SBN 277526)  
Interim Lead Class Counsel

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14 Dated: April 21, 2015

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20  
21 **PROPOSED ORDER**

22 **PURSUANT TO THE STIPULATED REQUEST, IT IS SO ORDERED.**

23 Any additional requests to continue the deadline to file a  
24 motion for preliminary approval will be strongly  
25 disfavored. The Court hereby CONTINUES the case  
26 management conference set for April 30, 2015, at 1:30  
p.m. to June 10, 2015, at 2:00 p.m.

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Hon. Lucy H. Koh  
United States District Judge

Dated: April 22, 2015