Electronically Filed by Superior Court of California, County of Orange, 06/18/2024 06:42:00 PM. 30-2021-01226723-CU-BC-CJC - ROA # 411 - DAVID H. YAMASAKI, Clerk of the Court By E. efilinguser, Deputy Clerk.

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8	Facsimile: (213) 443-3100	CONSERVANCY, INC.		
9	Attorneys for Defendant VIZIO, Inc.			
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11	SUDEDIOD COUDT OF T	ΓΗΕ STATE ΩΕ CAI ΙΕΩDΝΙΑ		
12	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
13	3 COUNTY OF ORANGE-CENTRAL JUSTICE CENTER			
14	SOFTWARE FREEDOM	CASE NO. 30-2021-01226723-CU-BC-CJC		
15	CONSERVANCY, INC., a New York Non-Profit Corporation,	CASE NO. 30-2021-01220/25-CU-BC-CJC		
16	Plaintiff,	PARTIES' JOINT STATEMENT REGARDING PLAINTIFF SOFTWARE		
17		FREEDOM CONSERVANCY INC.'S MOTION TO COMPEL FURTHER		
18	v. VIZIO, INC., a California Corporation; and	RESPONSES TO REQUESTS FOR		
19	DOES 1 through 50, Inclusive,	PRODUCTION (SET ONE) FROM DEFENDANT VIZIO INC.		
20	Defendant.	The Hon. Sandy Leal		
21				
22		Dept. C33		
23		Action Filed: October 19, 2021		
24		Trial Date: July 22, 2024		
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		Case No. 30-2021-01226723-CU-BC-CJC		
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1	JOINT STATEMENT		
2	On Thursday, June 6, 2024, the Court ordered the parties to continue to meet-and-confer		
3	regarding SFC's motion to compel further responses to its first set of requests for production (the		
4	"Firmware Motion"). On Friday, June 14, 2024, the parties filed a joint statement addressing,		
5	among other topics, their continued efforts to meet-and-confer regarding the Firmware Motion,		
6	including the terms and conditions of an in-person inspection. As of today, Tuesday, June 18, 2024,		
7	the parties are continuing to meet-and-confer on this subject in an effort to resolve the Firmware		
8	Motion without further judicial intervention. The parties will provide another update to the Court		
9	no later than Tuesday, June 25, 2024. The parties request that the Firmware Motion remain in		
10	abeyance in the meantime.		
11		Respectfully submitted,	
12	DATED: June 18, 2024	SHADES OF GRAY LAW GROUP, P.C.	
13		By <u>/s/ Naomi Jane Gray</u>	
14		Naomi Jane Gray	
15		Attorneys for Plaintiff SOFTWARE FREEDOM CONSERVANCY, INC	
16			
17		QUINN EMANUEL URQUHART & SULLIVAN, LLP	
18		By/s/ Michael E. Williams	
19		Michael E. Williams	
20		Attorney for Defendant	
21		VIZIO, Inc.	
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	-1- Case No. 30-2021-01226723-CU-BC-CJC		
		JOINT STATEMENT	

1	PROOF OF SERVICE		
2	I am employed at the law firm of Shades of Gray Law Group, P.C. in the County of		
3	Marin, State of California. I am over 18 years old and not a party to the within action. My		
4	business address is 100 Shoreline Highway, Suite 100B, Mill Valley, California 94041.		
5	On June 18, 2024, I served true and correct copies of the documents described as		
6	PARTIES' JOINT STATEMENT REGARDING PLAINTIFF SOFTWARE FREEDOM		
7	CONSERVANCY INC.'S MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION (SET ONE) FROM DEFENDANT VIZIO INC.		
8	on the parties in this action via electronic service to the emails below, pursuant to the parties'		
9	joint stipulation: "Electronic service will count as personal service on the day of that		
10	electronic service, if the electronic service occurs before midnight Pacific Time. If the		
11	electronic service occurs after midnight Pacific Time, that service will count as personal		
12	service for the following business day that is not a legal holiday."		
13	Michael E. Williams	QUINN EMANUEL URQUHART &	
14	michaelwilliams@quinnemanuel.com Daniel C. Posner	SULLIVAN, LLP 865 South Figueroa Street, 10th Floor	
15	<u>danposner@quinnemanuel.com</u> John Z. Yin	Los Angeles, CA 90017-2543 Telephone: (213) 443-3000	
16	johnyin@quinnemanuel.com	Fax: (213) 443-3100	
17	Arian J. Koochesfahani ariankoochesfahani@quinnemanuel.com		
18	I declare under penalty of perjury under the laws	of the State of California that the foregoing	
19	is true and correct.		
20	Executed on June 18, 2024, in Mill Valley, California.		
21		/s/ Natalia Ermakova	
22		Natalia Ermakova	
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	1	Case No. 30-2021-01226723-CU-BC-CJC	
	PROOF OF SERVICE	Case 110, 50-2021-01220/25-CO-DC-CJC	