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Attorneys for Plaintiff
SOFTWARE FREEDOM
CONSERVANCY, INC.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE-CENTRAL JUSTICE CENTER**

SOFTWARE FREEDOM
CONSERVANCY, INC.,
a New York Non-Profit Corporation,

Plaintiff,

v.

VIZIO, INC., a California Corporation; and
DOES 1 through 50, Inclusive,

Defendant.

CASE NO. 30-2021-01226723-CU-BC-CJC

**PARTIES' JOINT STATEMENT
REGARDING PLAINTIFF SOFTWARE
FREEDOM CONSERVANCY INC.'S
MOTION TO COMPEL FURTHER
RESPONSES TO REQUESTS FOR
PRODUCTION (SET ONE) FROM
DEFENDANT VIZIO INC.**

The Hon. Sandy Leal

Dept. C33
Action Filed: October 19, 2021
Trial Date: July 22, 2024

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 25, 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, July 2, 2024. The parties request that the Firmware Motion remain in
10 abeyance in the meantime.

11 Respectfully submitted,

12 DATED: June 25, 2024

SHADES OF GRAY LAW GROUP, P.C.

13 By /s/ Naomi Jane Gray
14 Naomi Jane Gray

15 Attorneys for Plaintiff
16 SOFTWARE FREEDOM CONSERVANCY, INC

17 QUINN EMANUEL URQUHART & SULLIVAN, LLP

18 By /s/ Michael E. Williams
19 Michael E. Williams

20 Attorney for Defendant
21 VIZIO, Inc.

PROOF OF SERVICE

I am employed at the law firm of Shades of Gray Law Group, P.C. in the County of Marin, State of California. I am over 18 years old and not a party to the within action. My business address is 100 Shoreline Highway, Suite 100B, Mill Valley, California 94041.

On June 25, 2024, I served true and correct copies of the documents described as

PARTIES' JOINT STATEMENT REGARDING PLAINTIFF SOFTWARE FREEDOM CONSERVANCY INC.'S MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR PRODUCTION (SET ONE) FROM DEFENDANT VIZIO INC.

on the parties in this action via electronic service to the emails below, pursuant to the parties' joint stipulation: "Electronic service will count as personal service on the day of that electronic service, if the electronic service occurs before midnight Pacific Time. If the electronic service occurs after midnight Pacific Time, that service will count as personal service for the following business day that is not a legal holiday."

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 25, 2024, in Mill Valley, California.

/s/ Natalia Ermakova
Natalia Ermakova