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**Date Judge Signed: November 13, 2024**  
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*Attorneys for Defendant*  
VIZIO, 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.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
JUSTICE CENTER  
NOV 13 2024  
DAVID H. YAMASAKI, Clerk of the Court  
BY: [Signature]  
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*Attorneys for Plaintiff,*  
Software Freedom Conservancy, Inc.

**CASE NO: 30-2021-01226723-CU-BC-CJC**

**STIPULATION AND [PROPOSED] ORDER**  
**CONTINUING NOVEMBER 14, 2024**  
**STATUS CONFERENCE**

The Hon. Sandy Leal  
Dept. C33  
Action Filed: October 19, 2021  
Trial Date: TBD

1 Plaintiff Software Freedom Conservancy Inc. ("SFC") and Defendant VIZIO, Inc.  
2 ("VIZIO") (collectively the "Parties") hereby submit this Joint Stipulation and [Proposed] Order  
3 requesting that the Court continue the current Status Conference and hearing on pending discovery  
4 motions scheduled for November 14, 2024 based on the following:

5 WHEREAS, the Court set a Status Conference on November 14, 2024 for the pending  
6 discovery motions and for setting a trial schedule. ~~See Register of Actions ("ROA") #438 (Minute~~  
7 ~~Order).~~

8 WHEREAS, lead trial counsel for Defendant VIZIO, Inc. ("VIZIO"), Michael Williams,  
9 will be out of the country on November 14, 2024 and unavailable to attend on that date.

10 WHEREAS, counsel for VIZIO and Plaintiff SFC could be available on November 21,  
11 2024 or December 5, 2024 for the Status Conference.

12 WHEREAS, with respect to the pending discovery motions, the Parties, having met and  
13 conferred through their respective counsel, resolved two of the pending motions: (1) VIZIO's  
14 Motion to Compel Answers to Form Interrogatories (ROA #290); and (2) SFC's Motion to  
15 Compel Further Responses to Special Interrogatories (ROA #301).

16 WHEREAS, the Parties are continuing to meet and confer in an effort to resolve the third  
17 discovery motion related to SFC's inspection of VIZIO's firmware (*i.e.*, SFC's Motion to Compel  
18 Further Responses to Requests for Production, Set One (ROA #305)) and request additional time  
19 to permit the parties to complete the inspection and report back any outstanding issues, as  
20 contemplated by the Court's tentative ruling on June 6, 2024.

21 NOW, THEREFORE, VIZIO and SFC jointly stipulate the following:

22 (1) the November 14, 2024 Status Conference be continued to November 21, 2024, or  
23 December 5, 2024, or on such a date and time thereafter that is convenient for the Court and  
24 counsel for the Parties; and

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1 (2) the November 14, 2024 Hearing on the pending discovery motions be continued to the  
2 week of December 16, 2024 or on such a date and time thereafter that is convenient for the Court  
3 and counsel for the Parties, to allow the Parties sufficient time to conduct the inspection of the  
4 firmware and identify any remaining issues for which the Court's guidance is needed.

5 **IT IS SO STIPULATED.**

6  
7 DATED: October 29, 2024

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

8  
9 By: /s/ Michael E. Williams

10 Michael E. Williams, Esq.  
11 Attorneys for Defendant,  
12 VIZIO, Inc.

13 DATED: October 29, 2024

**VAKILI & LEUS, LLP**

14 By: /s/ Sa'id Vakili

15 Sa'id Vakili, Esq.  
16 Attorneys for Plaintiff,  
17 Software Freedom Conservancy, Inc.  
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~~PROPOSED~~ ORDER

Based on the parties' Stipulation and finding good cause, the Court hereby GRANTS the requested relief. The Status Conference will be continued to December 5, 2024 at 10 A.M. The Hearing on SFC's Motion to Compel Further Responses to Requests for Production, Set One (ROA #305) will be continued to December 5, 202<sup>4</sup>~~3~~ at 10 A.M.

IT IS SO ORDERED.

DATED: NOV 13 2024



JUDGE OF THE SUPERIOR COURT  
Hon. Sandy N. Leal



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**PROOF OF SERVICE**

*Software Freedom Conservancy, Inc. v. VIZIO, Inc., et al.*  
*OCSC Case No.: 30-2021-01226723-CU-BC-CJC*

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 3701 Wilshire Boulevard, Suite 1135, Los Angeles, California 90010.

On October 29, 2024, I served the foregoing document described as **STIPULATION AND [PROPOSED] ORDER CONTINUING NOVEMBER 14, 2024 STATUS CONFERENCE** on all interested parties in this action at the addresses listed below, as follows:

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

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Los Angeles, California 90017

**213/443-3000** | Fax: 213/443-3100

*Counsel for Defendant VIZIO, Inc.*

( ) **FOR COLLECTION.** By placing true copies thereof enclosed in sealed envelopes, addressed as above, and by placing said sealed envelopes for collection and mailing on that date following ordinary business practices. I am “readily familiar” with the business’ practice for collection and processing of correspondence for mailing the U.S. Postal Service. Under that practice, the sealed envelopes would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business.

( ) **OVERNIGHT DELIVERY (DROP-OFF) (CCP §1013(c)).** By placing a true copy thereof enclosed in a sealed envelope or package as designated by an overnight mail courier, addressed as above, and depositing said envelope or package, with delivery fees provided for, in a box regularly maintained by the overnight mail courier at 3701 Wilshire Boulevard, Los Angeles, California 90010.

(☒) **VIA ELECTRONIC TRANSMISSION.** I caused to be transmitted a true copy thereof to the designated counsel listed above to his respective e-mail address, pursuant to California *Code of Civil Procedure* § 1010.6. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

( ) **PERSONAL DELIVERY.** I caused to be served by messenger for personal delivery that same day the foregoing documents in a sealed envelope to the above persons at the address(es) listed in the attached Service List.

I declare under penalty under the laws of the State of California that the above is true and correct. Executed on October 29, 2024, at Los Angeles, California.

Malou de la Paz  
(Printed Name)

/s/ Malou de la Paz  
(Signature)