

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, and through their undersigned counsel,
2 Meta, TikTok, Snap, and YouTube (“Defendants”); the MDL Personal Injury and School District
3 (“PI/SD”) Plaintiffs; and the MDL State Attorneys General (“State AGs”) (collectively, the
4 “Parties”) hereby agree to the following negotiated amendment of the Pretrial Schedule entered by
5 the Court in CMO No. 18 (ECF 1290).

6 1. WHEREAS, Defendants requested in their July 11, 2025 CMC Statement (ECF
7 2104) a six-week extension of the August 27, 2025 deadline for completion of expert depositions,
8 along with commensurate extensions of other deadlines set in CMO No. 18;

9 2. WHEREAS, the PI/SD Plaintiffs opposed that request, while the State AGs did not
10 oppose it;

11 3. WHEREAS, following the CMC on July 18, 2025, the Parties met and conferred in
12 an effort to apply the Court’s guidance and narrow areas of dispute;

13 4. WHEREAS, the PI/SD Plaintiffs continue to oppose an extension of any deadline
14 other than as set forth herein;

15 5. WHEREAS, the Court has previously extended expert deposition deadlines
16 generally, on agreement of all Parties to the MDL as part of an MDL-wide schedule extension, *see*
17 ECF 1159, and again as to four State AG-specific expert reports on agreement of the State AGs
18 and Meta, *see* ECF 1955.

19 **NOW, THEREFORE**, the Parties hereby jointly stipulate and request that the Court
20 approve the following proposed schedule extension:

21 1. The deadline for the close of expert discovery in the MDL, as set in CMO No. 18,
22 moves from August 27, 2025 to September 17, 2025 (an extension of three weeks), to permit the
23 completion of Eligible Depositions as defined in paragraph 6 below;

24 2. The deadline for Defendants to file Rule 702 motions as to two of Plaintiffs’ experts
25 whose depositions would, under the Parties’ agreement, be rescheduled for a date after September
26 10, 2025 (Dr. Stuart Murray and Dr. Jean Twenge), moves from September 24, 2025 to September
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1 30, 2025; and the deadline for Plaintiffs to file oppositions to those motions moves from October
2 27, 2025 to November 3, 2025, with Defendants' replies for those motions still due on November
3 25, 2025;

4 3. To the extent any other Eligible Depositions (besides the depositions of Dr. Murray
5 and Dr. Twenge) are moved to a date after September 10, 2025, Defendants reserve the right to
6 request, and Plaintiffs agree to confer in good faith regarding, a similar extension of the deadline
7 for Defendants to file a Rule 702 motion as to such expert and for Plaintiffs to file an opposition
8 to that motion;

9 4. Defendants withdraw their request to extend other deadlines included in the Pretrial
10 Schedule entered by the Court in CMO No. 18;

11 5. The extensions reflected in paragraphs 2 and 3 will not affect any other deadlines
12 included in the Pretrial Schedule entered by the Court in CMO No. 18;

13 6. "Eligible Depositions" includes only the following:

- 14 a. Depositions of experts who are unique to the MDL, i.e., not disclosed in the
15 JCCP (such as school district experts or State AG-only experts);
16 b. Depositions of non-case specific experts who are shared with the JCCP but
17 who have already been deposed in the JCCP;
18 c. Depositions of experts who have submitted case-specific reports in both
19 jurisdictions, but only as to their MDL case-specific reports.

20 7. For the avoidance of doubt, "Eligible Depositions" does not include the following:

- 21 a. Depositions of experts who are subject to the August 27, 2025 JCCP
22 deadline and who have **not** already been deposed in the JCCP; or
23 b. Depositions of experts concerning any JCCP case-specific opinions they
24 have offered.

1 8. The Parties have reached agreement on the specific expert depositions covered by
2 the definition of “Eligible Depositions” set forth above, as well as which Eligible Depositions will
3 move into the extension period.

4
5 **IT IS SO STIPULATED**, through Counsel of Record.

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7 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

8
9 Dated: _____

Honorable Yvonne Gonzalez Rogers
United States District Judge

11
12 Respectfully submitted,

13 Dated: July 28, 2025

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ATTESTATION

I hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: July 28, 2025

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