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14 *Interim Co-Lead Counsel for Plaintiffs*

15 **UNITED STATES DISTRICT COURT FOR THE**
16 **CENTRAL DISTRICT OF CALIFORNIA**
SANTA ANA DIVISION

17 IN RE: VIZIO, INC., CONSUMER
18 PRIVACY LITIGATION

Case No. 8:16-ml-02693- JLS (KESx)

19 This document relates to:
20 ALL ACTIONS

**STIPULATION TO EXTEND DEADLINE
TO FILE MOTION FOR PRELIMINARY
APPROVAL TO OCTOBER 3, 2018**

[PROPOSED ORDER FILED
CONCURRENTLY]

Judge Josephine L. Staton

1 Plaintiffs Dieisha Hodges, Rory Zufolo, John Walsh, Chris Rizzitello, Linda
2 Thomson , and Mark Queenan (collectively, “Plaintiffs”) and Defendants VIZIO, Inc.,
3 VIZIO Holdings, Inc., VIZIO Services, LLC (formerly known as “VIZIO Inscap
4 Services, LLC”), and Inscap Data, Inc. (formerly known as “VIZIO Inscap
5 Technologies, LLC”) (collectively, “VIZIO”) (collectively, the “Parties”) hereby request
6 an extension of the deadline for Plaintiffs to file a motion for preliminary approval and
7 stipulate as follows:

8 *Whereas*, the Parties jointly proposed a deadline of September 12, 2018, for
9 Plaintiffs to file a motion for preliminary approval of a class action settlement, *see* Doc.
10 272;

11 *Whereas*, the Court entered an order accepting that jointly proposed deadline, *see*
12 Doc. 273;

13 *Whereas*, the Parties now request an extension of the deadline for the motion for
14 preliminary approval, to and including October 3, 2018;

15 *Whereas*, there is good cause to grant this extension of time: The Parties are
16 developing a class notice program with direct notification to the class through VIZIO
17 Smart TV displays, which requires testing to make sure any TV notice can be properly
18 displayed and functions as intended. The additional time requested will allow the parties
19 to confirm that the notice program proposed in the motion for preliminary approval is
20 workable and satisfies applicable legal standards;

21 *Whereas*, this is the first request for an extension of time to file the motion for
22 preliminary approval, the Parties agree there is good cause for the extension, and the
23 extension is being filed more than five court days before the existing deadline;

24 *Therefore*, it is hereby stipulated and agreed among the Parties, through counsel,
25 and subject to this Court’s approval, that:

- 26 (1) Plaintiffs will file a motion for preliminary approval on or before October 3,
27 2018.

1 It is so stipulated.

2

3 Dated: September 5, 2018

GIRARD GIBBS LLP

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/s/ Andre Mura

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Plaintiffs' Interim Steering Committee

Dated: September 5, 2018

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18 *Attorneys for Defendants VIZIO, Inc.;*
19 *VIZIO Holdings, Inc.; VIZIO Services, LLC*
20 *(formerly known as “VIZIO Inscape*
21 *Services, LLC”); and Inscape Data,*
22 *Inc. (formerly known as “VIZIO Inscape*
23 *Technologies, LLC”)*

ATTESTATION OF E-FILED SIGNATURE

1 I, Andre Mura, am the ECF user whose ID and password are being used to file
2 the foregoing Stipulation to Extend Deadline to File Motion for Preliminary Approval
3 to October 3, 2018. In compliance with Local Rule 5-4.3.4, I hereby attest that the
4 other signatories on whose behalf this filing is submitted concur in the filing's
5 contents and authorized the filing.
6

7 Dated: September 5, 2018

/s/ Andre Mura
Andre Mura