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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CARLOS DADA, SERGIO ARAUZ, GABRIELA CÁCERES GUTIÉRREZ, JULIA GAVARRETE, ROMAN GRESSIER, GABRIEL LABRADOR, ANA BEATRIZ LAZO ESCOBAR, EFREN LEMUS, DANIEL LIZÁRRAGA, CARLOS LÓPEZ SALAMANCA, CARLOS MARTÍNEZ, ÓSCAR MARTÍNEZ, MARÍA LUZ NÓCHEZ, VÍCTOR PEÑA, NELSON RAUDA ZABLAH, DANIEL REYES MARTÍNEZ, MAURICIO SANDOVAL SORIANO, and JOSÉ LUIS SANZ,

Plaintiffs,

v.

NSO GROUP TECHNOLOGIES LIMITED and Q CYBER TECHNOLOGIES LIMITED,

Defendants.

Case No. 3:22-cv-07513-JD

JOINT STPULATION AND [PROPOSED] ORDER CONCERNING UPDATED BRIEFING FOR DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT

Action Filed: November 30, 2022

Defendants NSO Group Technologies Limited and Q Cyber Technologies Limited (collectively, "Defendants") and Plaintiffs Carlos Dada, Sergio Arauz, Gabriela Cáceres Gutiérrez, Julia Gavarrete, Roman Gressier, Gabriel Labrador, Ana Beatriz Lazo Escobar, Efren Lemus, Daniel Lizárraga, Carlos López Salamanca, Carlos Martínez, Óscar Martínez, María Luz Nóchez, Víctor Peña, Nelson Rauda Zablah, Daniel Reyes Martínez, Mauricio Sandoval Soriano, and José Luis Sanz (collectively, "Plaintiffs"), stipulate as follows and respectfully request that the Court order the briefing schedule requested by the parties.

WHEREAS, on April 21, 2023, Defendants filed a corrected motion to dismiss Plaintiffs' Amended Complaint on several grounds, ECF No. 46;

WHEREAS, the Court granted Defendants' motion, ruling that the case should be dismissed on the basis of *forum non conveniens*, and not addressing the other bases upon which Defendants contended dismissal was warranted, ECF No. 78;

WHEREAS, following Plaintiffs' appeal, on July 8, 2025, the Court of Appeals vacated this Court's order dismissing this case and remanded this case for reconsideration without determining whether Defendants' motion to dismiss should be granted on the basis of *forum non conveniens* or any other ground;

WHEREAS, Defendants intend to renew their motion to dismiss on the basis of *forum non conveniens* and other grounds included in Defendants' motion;

WHEREAS, the parties believe updated briefing will allow the parties to address the Court of Appeals's decision and factual and legal developments that postdate the filing of the parties' prior submissions and relate to the arguments raised by Defendants in their motion to dismiss;

WHEREAS, the parties have also conferred on a briefing schedule with the following deadlines, which take into account the professional commitments of counsel for the parties;

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THEREFORE, the parties respectfully request that the Court order updated briefing on Defendants' Motion to Dismiss Plaintiffs' Amended Complaint and set the following briefing schedule:

Motion to dismiss	September 11, 2025
Opposition	October 16, 2025
Reply brief, if any	October 30, 2025
Hearing	November 20, 2025, or such other date convenient to the Court.

Respectfully submitted,

DATED: August 25, 2025

KING & SPALDING LLP

/s/ Joseph N. Akrotirianakis
JOSEPH N. AKROTIRIANAKIS
AARON CRAIG

Attorneys for Defendants NSO Group Technologies Limited and Q Cyber Technologies Limited

KNIGHT FIRST AMENDMENT INSTITUTE AT COLUMBIA UNIVERSITY

DATED: August 25, 2025

/s/ Carrie DeCell
CARRIE DECELL
Knight First Amendment Institute at Columbia University

Counsel for Plaintiffs Carlos Dada, Sergio Arauz, Gabriela Cáceres Gutiérrez, Julia Gavarrete, Roman Gressier, Gabriel Labrador, Ana Beatriz Lazo Escobar, Efren Lemus, Daniel Lizárraga, Carlos López Salamanca, Carlos Martínez, Óscar Martínez, María Luz Nóchez, Víctor Peña, Nelson Rauda Zablah, Daniel Reyes Martínez, Mauricio Sandoval Soriano, and José Luis Sanz

FILER'S ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that the other signatories have concurred in this filing.

DATED: August 25, 2025 /s/ Carrie DeCell

[PROPOSED] ORDER

GOOD CAUSE THEREFORE APPEARING BASED ON THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED THAT:

1. Defendants shall refile any motion to dismiss, with updated points and authorities, by September 11, 2025.
2. Plaintiffs shall file any opposition to that motion by October 16, 2025.
3. Defendants may file a reply brief by October 30, 2025.
4. A hearing on any such motion will be held at 10:00 a.m. on _____, 2025, in the absence of a further order of the Court.

IT IS SO ORDERED.

DATED: _____

_____
THE HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE