

1 Joseph R. Saveri (State Bar No. 130064)
 2 Cadio Zirpoli (State Bar No. 179108)
 3 Christopher K.L. Young (State Bar No. 318371)
 4 Louis A. Kessler (State Bar No. 243703)
 5 Elissa A. Buchanan (State Bar No. 249996)
 6 William W. Castillo Guardado (State Bar No. 294159)
 7 Holden Benon (State Bar No. 325847)
JOSEPH SAVERI LAW FIRM, LLP
 601 California Street, Suite 1505
 San Francisco, California 94108
 Telephone: (415) 500-6800
 Facsimile: (415) 395-9940
 Email: jsaveri@saverilawfirm.com
 czirpoli@saverilawfirm.com
 cyoung@saverilawfirm.com
 lkessler@saverilawfirm.com
 eabuchanan@saverilawfirm.com
 wcastillo@saverilawfirm.com
 hbenon@saverilawfirm.com

Annette L. Hurst (State Bar No. 148738)
**ORRICK, HERRINGTON & SUTCLIFFE
 LLP**
 The Orrick Building
 405 Howard Street
 San Francisco, CA 94105
 Telephone: 415 773 5700
 Facsimile: 415-773-5759
 Email: ahurst@orrick.com

Counsel for GitHub, Inc. and Microsoft Corporation

Allyson R. Bennett (CA SBN 302090)
MORRISON & FOERSTER LLP
 707 Wilshire Boulevard
 Los Angeles, California 90017-3543
 Telephone: (213) 892-5200
 Facsimile: (213) 892-5454
 Email: ABennett@mof.com

Matthew Butterick (State Bar No. 250953)
 1920 Hillhurst Avenue, #406
 Los Angeles, CA 90027
 Telephone: (323) 968-2632
 Facsimile: (415) 395-9940
 Email: mb@buttericklaw.com

*Counsel for OpenAI, Inc.; OpenAI, L.P.;
 OpenAI OpCo., LLC; OpenAI GP, L.L.C.;
 OpenAI Startup Fund GP I, L.L.C.; OpenAI
 Startup Fund I, L.P.; and OpenAI Startup Fund
 Management, LLC*

*Counsel for Individual and Representative
 Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

J. DOE 1, et al.,
 Individual and Representative Plaintiffs,
 v.
 GITHUB, INC., et al.,
 Defendants.

Case Nos. 4:22-cv-06823-JST
 4:22-cv-07074-JST

**STIPULATION AND [PROPOSED] ORDER
 REGARDING REDACTIONS TO ORDER
 ON MOTION TO DISMISS SECOND
 AMENDED COMPLAINT**

1 Pursuant to Northern District of California Local Rule 7-12, the parties in the above-captioned
2 action hereby stipulate and agree as follows:

3 WHEREAS, on June 24, 2024, the Court issued its Order (ECF No. 253) granting in part and
4 denying in part motions to dismiss filed by Defendants GitHub, Inc and Microsoft Corporation, and the
5 OpenAI Defendants;

6 WHEREAS, on June 24, 2024, the Court restricted public access to the Order and requested that
7 the parties propose any redactions to the Order;

8 **NOW THEREFORE**, the parties, through their undersigned counsel, hereby stipulate and agree
9 that no redactions are necessary to the Order at ECF No. 253.

10
11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12
13 DATED: July 5, 2024



14 JON S. FIGAR
15 United States District Judge

1 Dated: July 1, 2024

2 By: /s/ Joseph R. Saveri
3 Joseph R. Saveri

4 Joseph R. Saveri (State Bar No. 130064)
5 Cadio Zirpoli (State Bar No. 179108)
6 Christopher K.L. Young (State Bar No. 318371)
7 Louis A. Kessler (State Bar No. 243703)
8 Elissa A. Buchanan (State Bar No. 249996)
9 William W. Castillo Guardado (State Bar No. 294159)
10 Holden Benon (State Bar No. 325847)
11 **JOSEPH SAVERI LAW FIRM, LLP**
12 601 California Street, Suite 1505
13 San Francisco, California 94108
14 Telephone: (415) 500-6800
15 Facsimile: (415) 395-9940
16 Email: jsaveri@saverilawfirm.com
17 czirpoli@saverilawfirm.com
18 cyoung@saverilawfirm.com
19 lkessler@saverilawfirm.com
20 eabuchanan@saverilawfirm.com
21 wcastillo@saverilawfirm.com
22 hbenon@saverilawfirm.com

23 Matthew Butterick (State Bar No. 250953)
24 1920 Hillhurst Avenue, #406
25 Los Angeles, CA 90027
26 Telephone: (323) 968-2632
27 Facsimile: (415) 395-9940
28 Email: mb@buttericklaw.com

Counsel for Plaintiffs and the Proposed Class

1 Dated: July 1, 2024

By: /s/ Annette L. Hurst
Annette L. Hurst

3 Annette L. Hurst (State Bar No. 148738)
4 **ORRICK, HERRINGTON & SUTCLIFFE LLP**
5 The Orrick Building
6 405 Howard Street
7 San Francisco, CA 94105
8 Telephone: 415 773 5700
9 Facsimile: 415-773-5759
10 Email: ahurst@orrick.com

11 *Counsel for GitHub, Inc. and Microsoft Corporation*

12 Dated: July 1, 2024

By: /s/ Allyson R. Bennett
Allyson R. Bennett

13 Allyson R. Bennett (CA SBN 302090)
14 **MORRISON & FOERSTER LLP**
15 707 Wilshire Boulevard
16 Los Angeles, California 90017-3543
17 Telephone: (213) 892-5200
18 Facsimile: (213) 892-5454
19 Email: ABennett@mofo.com

20 *Counsel for OpenAI, Inc.; OpenAI, L.P.; OpenAI*
21 *OpCo., LLC; OpenAI GP, L.L.C.; OpenAI Startup Fund*
22 *GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI*
23 *Startup Fund Management, LLC*

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: July 1, 2024

By: /s/ Joseph R. Saveri
Joseph R. Saveri

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28