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12 Page]

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 **IN RE GOOGLE PLAY STORE**  
17 **ANTITRUST LITIGATION**

18 THIS DOCUMENT RELATES TO:

19 *Epic Games Inc. v. Google LLC et al.*,  
20 Case No. 3:20-cv-05671-JD

21 *Match Group, LLC et al. v. Google LLC et al.*,  
22 Case No. 3:22-cv-02746-JD

Case No. 3:21-md-02981-JD

**EPIC’S AND MATCH’S NOTICE OF  
MOTION AND MOTION TO AMEND  
COMPLAINTS**

Date: November 17, 2022 at 10:00 a.m.  
Courtroom: 11, 19<sup>th</sup> Floor  
Judge: Hon. James Donato

**TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on November 17, 2022, at 10:00 a.m., or as soon thereafter as the matter may be heard, in the United States District Court for the Northern District of California, before the Honorable James Donato, Plaintiff Epic Games, Inc. (“Epic”) and Plaintiffs Match Group LLC, Humor Rainbow, Inc., PlentyofFish Media ULC, and People Media, Inc., (“Match”) will and hereby do move for an order granting Epic and Match leave to file their proposed amended complaints (“Proposed Amended Complaints,” which are submitted with this motion as Exhibits A and K) and ordering that the Proposed Amended Complaints be deemed filed. This motion is made pursuant to Federal Rule of Civil Procedure (“FRCP”) 15 on the grounds that granting this motion will not result in prejudice, the motion is neither futile nor legally insufficient, Epic and Match bring this motion without undue delay, and Epic and Match are not seeking leave to amend in bad faith. In addition, this motion is made pursuant to FRCP 16 on the ground that there is good cause to modify the Second Amended MDL Scheduling Order for the limited purpose of permitting Epic and Match to file their Proposed Amended Complaints. This motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Proposed Amended Complaints, Declaration of Michael J. Zaken (the “Zaken Decl.”) and [Proposed] Order, as well as all matters with respect to which this Court may take judicial notice, and such oral and documentary evidence as properly may be presented to the Court.

**STATEMENT OF RELIEF SOUGHT**

Epic and Match seek an Order granting their request to allow Epic and Match to file their Proposed Amended Complaints pursuant to FRCP Rule 15 and amend the Second Amended MDL Scheduling Order for the limited purpose of allowing Epic and Match to do so.

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