IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

HADONA DIEP,	
Plaintiff,	
v.	Civil Action No.: 8:21-cv-02359-PJM
APPLE, INC.,	
Defendant.	

STIPULATION REGARDING MOTION TO TRANSFER VENUE AND DEADLINE TO RESPOND TO COMPLAINT

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff Hadona Diep ("Plaintiff") and Defendant Apple Inc. ("Defendant"), through their undersigned counsel, subject to the approval of the Court, as follows:

- 1. Plaintiff filed her Complaint in the above-referenced matter on September 16, 2021 (ECF No. 1).
- 2. On November 4, 2021, Plaintiff moved to transfer the case to the United States District Court for the Northern District of California (ECF No. 13).
- 3. Defendant was served with the Complaint on December 9, 2021, and a Proof of Service was filed with the Court on December 16, 2021 (ECF No. 14).
- 4. The parties met and conferred on December 16, 2021, and Defendant consents to Plaintiff's motion to transfer venue (ECF No. 13).
- 5. The parties further stipulate and agree that Defendant's response to the Complaint shall be due forty-five (45) days after the date on which this case is transferred and opened by the Court in the United States District Court for the Northern District of California.



Dated: December 23, 2021

PLAINTIFF

HADONA DIEP,

/s/ Edward N. Griffin_

Edward N. Griffin (Bar No. 16435) Joshua G. Whitaker (Bar No. 16457)

ADELPHI LAW
2306 Wineberry Terrace
Baltimore, MD 21209
T: (888) 367-0383
F: (888) 367-0383
griffin@adelphilaw.com
whitaker@adelphilaw.com

DEFENDANT

APPLE INC.

/s/ A. Neill Thupari_

Michael P. O'Day (Bar No. 27075) Ellen E. Dew (Bar No. 28830) A. Neill Thupari (Bar No. 13065) Emily M. Steiner (Bar No. 20433)

DLA PIPER LLP (US)
The Marbury Building
6225 Smith Avenue
Baltimore, MD 21209
T: (410) 580-3000
F: (410) 580-3001
michael.oday@us.dlapiper.com
ellen.dew@us.dlapiper.com
neill.thupari@us.dlapiper.com
emily.m.steiner@us.dlapiper.com



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December 2021, a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will serve all counsel of record.

/s/ A. Neill Thupari_

A. Neill Thupari (Bar No. 13065) Counsel for Defendant Apple Inc.

