

1 COOLEY LLP
BOBBY GHAJAR (198719)
2 (bghajar@cooley.com)
ELLIE DUPLER (337607)
3 (edupler@cooley.com)
1333 2nd Street, Suite 400
4 Santa Monica, California 90401-4100
Telephone: (310) 883-6400
5 Facsimile: (310) 883-6500

6 JOHN PAUL OLEKSIUK (283396)
(jpo@cooley.com)
7 55 Hudson Yards
New York, NY 10001-2157
8 Telephone: (212) 479-6000
Facsimile: (212) 479-6275

9 JUDD D. LAUTER (290945)
jlauter@cooley.com
10 3 Embarcadero Center, 20th Floor
San Francisco, California 94111-4004
11 Telephone: (415) 693-2000
12 Facsimile: (415) 693-2222

13 *Counsel for Defendant Midjourney, Inc.*

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16
17 DISNEY ENTERPRISES, INC., et al.,

18 Plaintiffs,

19 v.

20 MIDJOURNEY, INC.,

21 Defendant.

Case No. 2:25-cv-05275-JAK-AJR

**STIPULATION TO EXTEND
TIME TO RESPOND TO
INITIAL COMPLAINT BY NOT
MORE THAN 30 DAYS
(L.R. 8-3)**

COMPLAINT SERVED: JUNE 13, 2025
CURRENT RESPONSE DATE: JULY 7,
2025

NEW RESPONSE DATE: AUGUST 6,
2025

1 IT IS HEREBY STIPULATED by and between the parties, through their
2 respective counsel, that Defendant Midjourney, Inc. may have a thirty-day extension
3 of time, from Monday, July 7, 2025 to Wednesday, August 6, 2025, to answer, plead,
4 or otherwise respond to the Complaint.

5 Pursuant to Central District Local Rule 8-3, an initial stipulation extending the
6 time within which to answer or otherwise respond to a complaint or petition by thirty
7 days or less must be filed with the Clerk but does not require Court approval.

8 This is the first request for an extension in this action.

9
10 Dated: July 1, 2025

Respectfully Submitted,

JENNER & BLOCK LLP

11
12 By: /s/ Julie A. Shepard

13 David R. Singer
14 Julie A. Shepard
15 Lauren M. Greene

Counsel for Plaintiffs

16 Dated: July 1, 2025

Respectfully Submitted,

COOLEY LLP

17
18 By: /s/ Bobby Ghajar

19 Bobby Ghajar
20 John Paul Oleksiuk
21 Judd Lauter
22 Ellie Dupler

Counsel for Defendant

23 **ATTESTATION OF CONCURRENCE IN FILING**

24 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), I hereby attest that concurrence in the filing of this
25 document has been obtained from each of the other signatories.

26 Dated: July 1, 2025

COOLEY LLP

27 By: /s/ Bobby Ghajar

28 Bobby Ghajar