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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HEWLETT PACKARD ENTERPRISE CO.
 and JUNIPER NETWORKS, INC.

Defendants.

CASE NO. 5:25-cv-00951-PCP

**MOTION TO SHORTEN TIME ON
 MOTION FOR RELIEF FROM STAY TO
 FILE MOTION FOR HOLD SEPARATE
 ORDER**

Judge: P. Casey Pitts

Action Filed: January 30, 2025

Proposed Intervenor, the Attorneys General for the States of Colorado, California, Connecticut, Hawaii, Illinois, Massachusetts, Minnesota, North Carolina, New York, Oregon, Washington, Wisconsin, and the District of Columbia (the “States”) hereby move to shorten time on their Motion for Relief From Stay To File Motion for Hold Separate Order (the “Motion for Relief”). The States seek to shorten time so that the Motion for Relief can be heard on the same day as the States’ Motion for Intervention, which the Court has set for hearing at 10:00 am on November 18, 2025. The States do not request that the time to file opposition briefs or a reply

1 brief be shortened.

2 The States contacted the parties to this case on October 15, 2025, and requested a phone
3 conferral for either October 16, 2025, or October 17, 2025. Before receiving a response, the
4 Court entered an Order partially granting the parties' request for a stay due to the federal
5 government shutdown. Order (Oct. 15, 2025) (Dkt. No. 237). The States then notified the
6 parties by email on October 16, 2025, that they would be filing the Motion for Relief and this
7 motion to shorten time.

8 The United States then informed the States that the United States takes no position on this
9 motion at this time.

10 The Defendants then informed the States that they oppose this motion and do not consent
11 to its filing.

12 Pursuant to the Court's Civil Local Rules, the earliest the Motion for Relief could be
13 heard is November 21, 2025. That is only three days after the scheduled hearing on the States'
14 Motion for Intervention. Rather than hear the matters a few days apart, it would be more
15 efficient for the Court and for the parties to be heard on the same day. This would preserve
16 judicial resources, and it would preserve the States' and the parties' resources; the States and the
17 parties' counsel are geographically dispersed around the country, and it would save resources to
18 avoid traveling to the Court multiple times within a week, or extending their stay.

19 Shortening time also would not burden the parties because the States do not request that
20 parties' time to respond be shortened.¹

21 This motion to shorten time is being filed concurrently with the Motion for Relief. The
22 Motion for Relief requests that the Court partially lift the stay on this matter to allow the States
23 to move for a hold separate order so that the Defendants freeze their integration efforts and to
24 preserve the status quo pending the Court's determination of whether the proposed settlement in

25 ¹ The States acknowledge that this request would result in a shorter time between the filing of a
26 reply brief and the hearing, which may present a burden to the Court. In that event, the States
27 would be willing to file a reply brief within five days of any opposition, on November 5, 2025.
28 This would give the Court thirteen days to review before the requested hearing date on
November 18, 2025.

1 this matter is in the public interest under the Tunney Act.

2 **CONCLUSION**

3 For the foregoing reasons, the States respectfully request that this Court grant this Motion
4 and set the Motion for Relief for a hearing on November 18, 2025, at 10:00 am.

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