

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AIR CANADA AND AEROPLAN INC.,

Plaintiffs,

v.

LOCALHOST LLC,

Defendant.

C.A. No. 23-1177-GBW

**STIPULATION AND [PROPOSED] ORDER  
STAYING CASE AND EXTENDING DEADLINES**

WHEREAS, Plaintiffs Air Canada and Aeroplan Inc. and Defendant Localhost LLC have established core settlement terms, are continuing to discuss the details of those and other terms, and are continuing to work towards finalizing and executing a settlement agreement. The parties believe those efforts will proceed most efficiently if the above-captioned case is stayed for approximately ninety days and pending deadlines and events are extended on the terms set forth below.

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and Defendant, subject to the approval of the Court, that the action is STAYED through January 29, 2026, and the pending deadlines and events are extended as follows:

Event	Current Deadline	Proposed Deadline
Disclosure of expert testimony under Federal Rule of Civil Procedure 26(a)(2) for the party who has the initial burden of proof on the subject matter.	November 14, 2025	February 20, 2026
Supplemental disclosure to contradict or rebut evidence on the matter identified by another party.	December 5, 2025	March 6, 2026

Reply expert reports from the party with the initial burden of proof.	December 19, 2025	March 20, 2026
Expert discovery cut off.	January 2, 2026	April 3, 2026
Deadline to file case-dispositive motions, including an opening brief and affidavits accompanying such motion.	January 30, 2026	Parties to file a stipulation with the date for filing case-dispositive motions on or before February 20, 2026
Pretrial conference	April 7, 2026 at 3:00 p.m.	To be set by the Court
2 Day Jury Trial	April 13, 2026 at 9:30 a.m.	To be set by the Court

Dated: November 11, 2025

MCCARTER & ENGLISH, LLP

GELLERT SCALI BUSENKELL & BROWN, LLC

/s/ Alexandra M. Joyce  
 Daniel M. Silver (#4758)  
 Alexandra M. Joyce (#6423)  
 Renaissance Centre  
 405 N. King Street, 8th Floor  
 Wilmington, Delaware 19801  
 (302) 984-6300  
 dsilver@mccarter.com  
 ajoyce@mccarter.com

/s/ Charles J. Brown  
 Charles J. Brown, III (#3368)  
 201 N. Orange Street, Suite 300  
 Wilmington, DE 19801  
 (302) 425-5800  
 cbrown@gsbblaw.com

*Counsel for Defendant*

*Counsel for Plaintiffs*

IT IS HEREBY ORDERED this 12<sup>th</sup> day of November, 2025.

United States District Judge