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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

APPLE INC.,

Plaintiff,

v.

MICHAEL RAMACCIOTTI and JON
PROSSER,

Defendants.

Case No. 3:25-cv-06043-JD

JOINT STATUS REPORT

Judge: Hon. James Donato

Action Filed: July 17, 2025

1 Pursuant to the last Joint Status Report (ECF No. 33), Plaintiff Apple Inc. and Defendant
2 Michael Ramacciotti submit this Joint Status Report. Defendant Jon Prosser did not respond to
3 repeated outreach and therefore did not contribute to the joint status report.

4 **1. Case Update.**

5 Since the parties' last status update on June 10, 2026 (ECF No. 33), the Court entered
6 Apple's stipulation to let Mr. Prosser set aside the entry of default against him (ECF No. 35) and
7 Mr. Prosser has joined the case, filing an answer on July 2, 2026 (ECF No. 36).

8 **2. Discovery.**

9 Apple and Mr. Prosser have worked to advance this case through limited discovery. Mr.
10 Prosser provided documents and communications to Apple, and sat for a deposition on June 16,
11 2026. Unfortunately, Apple last heard from Mr. Prosser's counsel on July 6th, 2026, despite
12 repeated attempts to communicate and follow up on outstanding discovery issues. There still
13 appear to be deficiencies in Mr. Prosser's productions, and Apple has notified Mr. Prosser's
14 counsel of those issues.

15 Shortly before this joint status update was to be filed, Mr. Prosser's counsel explained that
16 this delay in response may be due to the fact that Mr. Prosser just had a second child and is
17 attending to the care of a newborn. Mr. Prosser's counsel indicated that he will find dates when
18 additional discovery may be provided to Apple.

19 As per the previous status update, Mr. Ramacciotti has also agreed to supplement his
20 interrogatory responses and sit for a second deposition. This deposition is scheduled to take place
21 in September 2026.

22 **3. Scheduling.**

23 The parties anticipate filing a further update with the Court on October 7, 2026.
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1 Dated: August 5, 2026

MORRISON & FOERSTER LLP

2 By: /s/ Richard S.J. Hung

3 Richard S.J. Hung

4 *Attorneys for Plaintiff*
5 APPLE INC.

6 Dated: August 5, 2026

BROWN, NERI, SMITH & KHAN LLP

7 By: /s/ Andrew M. Purdy

8 Andrew M. Purdy

9 *Attorneys for Defendant*
10 MICHAEL RAMACCIOTTI

11 Dated: August 5, 2026

EDMONDSON IP LAW

12 By: /s/ J. Curtis Edmondson

13 J. Curtis Edmondson

14 *Attorneys for Defendant*
15 JOHN PROSSER

ATTESTATION OF E-FILED SIGNATURE

I, Richard S.J. Hung, am the ECF User whose ID and password are being used to file this Joint Status Report. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Andrew M. Purdy and J. Curtis Edmondson have concurred in this filing.

/s/ Richard S.J. Hung

Richard S.J. Hung