

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFF HOBBS; ALFRED DOUGLAS
STONE; THOMAS DOOLEY, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.; MARK
ZUCKERBERG; JOHN DOES 1-100,

Defendants.

Case No. 1:26-cv-04314-PAE

**STIPULATION AND ORDER TRANSFERRING VENUE TO THE NORTHERN
DISTRICT OF CALIFORNIA ON CONSENT PURSUANT TO 28 U.S.C. § 1404(a)**

WHEREAS, on May 22, 2026, Jeff Hobbs and Alfred Douglas Stone filed this action in the United States District Court for the Southern District of New York under Case No. 1:26-cv-04314-PAE;

WHEREAS, on September 16, 2026, Jeff Hobbs, Alfred Douglas Stone, and Thomas Dooley (“Plaintiffs”) filed an amended complaint (the “Amended Complaint”) against Meta Platforms, Inc. and Mark Zuckerberg (“Defendants,” and together with Plaintiffs, the “Parties”);

WHEREAS, without waiver of any rights or concessions by any Party as to the propriety of the Southern District of New York as the venue for this action, all Parties consent to transfer this action to the United States District Court for the Northern District of California (“Transferee Court”);

WHEREAS, Plaintiffs' counsel of record, David S. Stone and Eric C. Cohen of Stone & Magnanini, LLP, have appeared in this Court, have litigated this action since its filing, and are familiar with the record, and Defendants do not contest or oppose Plaintiffs' view that to retain and associate additional California counsel solely by reason of a transfer that the Parties are effecting on consent would impose unnecessary expense and delay;

WHEREAS, in light of the Parties' agreement that this action will be transferred, the Parties believe that requiring Defendants to respond to the Amended Complaint in this Court before the transfer is effectuated would not serve the interests of judicial economy and would impose unnecessary burden and expense on the Parties and the Court;

WHEREAS, the Parties further agree that the deadline for Defendants to respond to the Amended Complaint should instead be set by the Transferee Court after this action has been transferred and docketed in the Transferee Court;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, that:

1. This action shall be and hereby is transferred to the United States District Court for the Northern District of California on the Parties' consent pursuant to 28 U.S.C. § 1404(a);
2. The Clerk of this Court is directed to transfer this action to the United States District Court for the Northern District of California upon entry of this Order;
3. Defendants consent to, and shall not oppose, object to, or otherwise take any position adverse to, any request by Plaintiffs or their counsel of record, whether by application, motion, or stipulation, that the Transferee Court waive any local rule (including, N.D. Ca. Civil Local Rule 11-3) that may require Plaintiffs' counsel to associate California

counsel or an attorney maintaining an office in California, and that the Transferee Court otherwise permit Plaintiffs' counsel of record to appear in this action, including by admission pro hac vice, without such association;

4. The pendency of any such request shall not be a basis for Defendants to seek to delay or stay any scheduling, case management, briefing, or other proceeding in the Transferee Court, and Defendants shall not contend that Plaintiffs are unrepresented, or that any filing by Plaintiffs' counsel of record is improper, by reason of such pendency;
5. All deadlines set forth in the Case Management Plan entered on September 21, 2026, are hereby vacated pending further order of the Transferee Court or this Court;
6. Defendants' deadline of October 7, 2026, to answer, move, or otherwise respond to the Amended Complaint, is hereby vacated;
7. Defendants shall answer, move, or otherwise respond to the Amended Complaint by a date agreed by the Parties and ordered by the Transferee Court, and the Parties shall submit a proposed stipulation setting that date within fourteen (14) days after this action is docketed in the Transferee Court. The Parties further agree to meet and confer on a proposed schedule for the remainder of the case within fourteen (14) days after this action is docketed in the Transferee Court;
8. Nothing in this Stipulation and Order shall prejudice or limit any right of Plaintiffs or the putative class including with respect to the relation, consolidation, or coordination of this action with any other action or the appointment of interim class counsel under Federal Rule of Civil Procedure 23(g) and nothing herein shall affect any Party's obligation to preserve documents and information; and

9. In the event this stipulation is rejected by the Court, Defendants shall answer, move, or otherwise respond to the Amended Complaint within fourteen (14) days after entry of the Court's order rejecting the stipulation.

Dated: October 2, 2026

By: /s/ Kyle N. Smith

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SO ORDERED.



Honorable Paul A. Engelmayer
United States District Judge

Date: October 5, 2026