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Attorneys for Plaintiff  
Invisible Narratives LLC

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

INVISIBLE NARRATIVES LLC,

Plaintiff,

v.

NEXT LEVEL APPS TECHNOLOGY –  
FZCO,

Defendant.

CASE NO. 5:25-cv-01644-NW

**STIPULATION TO EXTEND TEMPORARY  
RESTRAINING ORDER AND RESET  
HEARING ON PRELIMINARY INJUNCTION**

1 Plaintiff Invisible Narratives, LLC (“Invisible Narratives”), through its counsel of record, and  
2 Defendant Next Level Apps Technology – FZCO (“Next Level”), stipulate and agree as follows:

3 WHEREAS, on February 14, 2025, Invisible Narratives filed its Complaint (D.E. 1);

4 WHEREAS, on February 18, 2025 Invisible Narratives applied *ex parte* (“Application”) for a  
5 Temporary Restraining Order (“TRO”) and Order to Show Cause for Preliminary Injunction (D.E. 9  
6 through 9-9);

7 WHEREAS, on February 19, 2025, the Court granted Invisible Narratives’ Application and  
8 issued a TRO against Next Level (D.E. 11 at 8-9);

9 WHEREAS, the Court set a hearing on Invisible Narratives’ motion for a preliminary injunction  
10 (“Hearing”) for March 3, 2025, at 11:00am and reset the Hearing to 9:00am (D.E. 11 at 9, 14, 16);

11 WHEREAS, on February 20, 2025, Invisible Narratives served Next Level via email and Federal  
12 Express with the Complaint, Summons, and all papers related to the Application and the Court’s Order  
13 granting same (D.E. 13);

14 WHEREAS, on February 27, 2025, Next Level, through Taras Rudyy, an attorney practicing in  
15 Kyiv, Ukraine,<sup>1</sup> contacted counsel for Invisible Narratives, indicating receipt of said service copies, and  
16 stated that Next Level is in the process of identifying and retaining litigation counsel in California (*see*  
17 Declaration of Ian Ballon (“Ballon Decl.”) Ex. 1);

18 WHEREAS Mr. Rudyy requested Invisible Narratives’ agreement to postpone the Hearing for  
19 60 days, and indicated that in exchange Next Level would agree to extend the TRO until the Hearing  
20 date (*see* Ballon Decl. Ex. 1);

21 WHEREAS, Next Level agrees to comply with the TRO as so extended;

22 WHEREAS, Mr. Rudyy represents that he has the power and authority to bind Next Level to the  
23 foregoing agreement;

24 WHEREAS, in exchange for Next Level’s compliance with the TRO as so extended, Invisible  
25 Narratives agrees to request that the Hearing be postponed as requested by Next Level, subject to the  
26 Court’s availability and convenience; and

27 WHEREAS, good cause exists for extension of the TRO until the Hearing;

28 \_\_\_\_\_  
<sup>1</sup> Mr. Rudyy is not licensed to practice law in the United States or in this District.

NOW THEREFORE, the Parties hereby stipulate and agree that:

1. The Hearing on Invisible Narratives’ motion for preliminary injunction shall be postponed by a period of sixty (60) days, subject to the Court’s availability and convenience; and

2. The TRO shall be and hereby is extended until and through the Hearing.

Respectfully submitted,

Dated: March 3, 2025

By: /s/ Ian C. Ballon  
Ian C. Ballon  
Jie (Lisa) Li  
Amy L. Kramer (*pro hac vice*)  
GREENBERG TRAURIG, LLP


Attorneys for Plaintiff Invisible Narratives, LLC

Dated: March 3, 2025

By:   
NEXT LEVEL APPS TECHNOLOGY - FZCO  
By: STANISLAV CHUPRYKOV  
Managing Director



Dated: March 3, 2025

By:   
NEXT LEVEL APPS TECHNOLOGY - FZCO  
By: Taras Rudy  
Rudy Patent Studio

