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9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13
14 IN RE APPLE INC. SECURITIES
15 LITIGATION

16 This Document Relates to:

17 ALL ACTIONS.

18 Case No. 4:19-cv-02033-YGR

19 **CLASS ACTION**

20 **STIPULATION AND [PROPOSED]**
ORDER REGARDING: (1) BRIEFING
SCHEDULE FOR LEAD PLAINTIFF'S
MOTION FOR LEAVE TO FILE THE
PROPOSED SECOND AMENDED
CLASS ACTION COMPLAINT; AND (2)
EXPERT DEPOSITIONS DEADLINE

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1 This Stipulation is entered into by and among Lead Plaintiff Norfolk County Council as
 2 Administering Authority of the Norfolk Pension Fund (“Lead Plaintiff”) and Defendants Apple
 3 Inc. (“Apple”), Timothy Cook, and Luca Maestri (collectively “Defendants” and together with the
 4 Lead Plaintiff, the “Parties”), through their respective attorneys of record.

5 WHEREAS, on July 5, 2022, Lead Plaintiff filed a Motion for Leave to File the Proposed
 6 Second Amended Class Action Complaint (the “Motion”) [Dkt. No. 250];

7 WHEREAS, in light of competing deadlines, Defendants have requested a one-week
 8 extension of the deadline set by the Local Rules for their opposition to the Motion, and Lead
 9 Plaintiff does not oppose that request;

10 WHEREAS, because the Motion makes reference to a substantial volume of discovery
 11 materials that Defendants have designated as Confidential or Highly Confidential pursuant to the
 12 Stipulated Protective Order, Lead Plaintiff has also filed an Administrative Motion to Consider
 13 Whether Another Party’s Material Should Be Sealed (the “Administrative Motion”) [Dkt. No.
 14 249];

15 WHEREAS, in light of competing deadlines, Defendants have requested an extension of
 16 the deadline set by Local Rule 79-5(f)(3) to file a statement and/or declaration in support of any
 17 sealing request in connection with the Administrative Motion, to align that deadline with the
 18 deadline for Defendants’ opposition to the Motion, and Lead Plaintiff does not oppose that
 19 request;

20 WHEREAS, the Court’s Case Management Order [Dkt. No. 128] set a deadline of July
 21 22, 2022 for the Parties to complete expert depositions;

22 WHEREAS, Lead Plaintiff has requested a one-week extension of the deadline for expert
 23 depositions for the sole purpose of permitting the deposition of one of Lead Plaintiff’s experts to
 24 proceed during the week of July 25, 2022, and Defendants do not oppose that request;

25 NOW THEREFORE, it is stipulated and agreed among the undersigned Parties, and
 26 respectfully submitted for the Court’s approval as follows:

27 1. Defendants shall file any opposition to the Motion no later than July 26, 2022;
 28 2. Lead Plaintiff shall file any reply in support of the Motion no later than August 5,

1 2022;

2 3. Defendants shall file any statement and/or declaration in support of any sealing
3 request in connection with the Administrative Motion no later than July 26, 2022.

4 4. The July 22, 2022 deadline for depositions of other expert witnesses remains
5 unchanged, except that the deposition of one of Lead Plaintiff's experts may be completed by
6 July 29, 2022.

7 **IT IS SO STIPULATED.**

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9 Dated: July 8, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

11 */s/ James N. Kramer*

12 JAMES N. KRAMER
13 Attorneys for Defendants
14 Apple Inc., Timothy Cook, and Luca Maestri

15 Dated: July 8, 2022

16 ROBBINS GELLER RUDMAN & DOWD LLP

17 */s/ Shawn A. Williams*

18 SHAWN A. WILLIAMS
19 Counsel for Lead Plaintiff,
20 Norfolk County Council as Administering
21 Authority of the Norfolk Pension Fund

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CIVIL L.R. 5-1 ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I, James N. Kramer, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order regarding Briefing Schedule for Lead Plaintiff's Motion for Leave to File the Proposed Second Amended Complaint. In compliance with General Order 45, X.B., I hereby attest that Shawn A. Williams has concurred in this filing.

/s/ James N. Kramer

JAMES N. KRAMER

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 12, 2022

Yvonne Gonzalez Rogers
HONORABLE YVONNE GONZALEZ ROGERS