

1 JAMES N. KRAMER (SBN 154709)
jkramer@orrick.com
2 ALEXANDER K. TALARIDES (SBN 268068)
atarides@orrick.com
3 ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
4 405 Howard Street
San Francisco, CA 94105-2669
5 Telephone: (415) 773-5700
Facsimile: (415) 773-5759
6

7 Attorneys for Defendants Apple Inc.,
Timothy Cook and Luca Maestri

8 [additional counsel appears on signature page]
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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION
13

14 IN RE APPLE INC. SECURITIES
15 LITIGATION

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

CLASS ACTION

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17 This Document Relates to:
18 ALL ACTIONS.
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**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

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/s/ James N. Kramer

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JAMES N. KRAMER

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Attorneys for Defendants

Apple Inc., Timothy Cook, and Luca Maestri

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15 Dated: July 8, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

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/s/ Shawn A. Williams

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SHAWN A. WILLIAMS

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Counsel for Lead Plaintiff,

Norfolk County Council as Administering
Authority of the Norfolk Pension Fund

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