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Lead Counsel for Lead Plaintiff

[Additional counsel appear on signature page.]

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 OAKLAND DIVISION

19 In re APPLE INC. SECURITIES )  
 20 LITIGATION )

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

CLASS ACTION

21 \_\_\_\_\_ )  
 22 This Document Relates To: )

23 ALL ACTIONS. )  
 24 \_\_\_\_\_ )

STIPULATION AND ~~PROPOSED~~ ORDER  
 REGARDING BRIEFING SCHEDULE FOR  
 DEFENDANTS' MOTION FOR RELIEF  
 FROM NONDISPOSITIVE PRETRIAL  
 ORDER OF MAGISTRATE JUDGE

28

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

5 WHEREAS, on February 24, 2022, the Parties filed a Joint Discovery Letter Brief (the  
6 “Discovery Letter Brief”) (ECF 227);

7  
8 WHEREAS, on February 26, 2022, Magistrate Judge Spero requested full briefing on the  
9 issues set forth in the Discovery Letter Brief (ECF 229);

10 WHEREAS, on April 15, 2022, following Plaintiff’s filing of a Motion to Compel  
11 Production (the “Motion to Compel”), and briefing by the Parties on the Motion to Compel,  
12 Magistrate Judge Spero held a hearing regarding the Motion to Compel (ECF 238);

13  
14 WHEREAS, on April 15, 2022, Magistrate Judge Spero ordered Defendants to produce  
15 additional redacted documents and declarations and directed the Parties to engage in further meet-  
16 and-confer efforts, as well as provided for additional briefing should the Parties be unable to resolve  
17 their disputes (ECF 238);

18  
19 WHEREAS, on July 13, 2022, after the additional briefing, Magistrate Judge Spero ordered  
20 Defendants to electronically lodge the documents that remained in dispute by July 20, 2022, and set  
21 a further hearing on the Motion to Compel for July 29, 2022 (ECF 257);

22  
23 WHEREAS, on July 29, 2022, Magistrate Judge Spero held a further hearing on the Motion  
24 to Compel (ECF 268);

25  
26 WHEREAS, on August 3, 2022, Magistrate Judge Spero issued an order granting in part and  
27 denying in part the Motion to Compel, requiring Defendants to produce certain documents deemed  
28 by Magistrate Judge Spero to be non-privileged by August 5, 2022 (ECF 272);

1 WHEREAS, on August 5, 2022, Defendants filed Defendants' Motion for Relief from  
2 Nondispositive Pretrial Order of Magistrate Judge (ECF 276) (the "Motion for Relief"), and  
3 Defendants' Emergency Administrative Motion for Stay of Discovery Order Pending Review and  
4 for an Administrative Stay Pending Decision on Motion to Stay (ECF 277);

5 WHEREAS, on August 8, 2022, the Court granted a limited stay and issued an Order  
6 directing the Parties to meet and confer no later than Tuesday, August 9, 2022, as to a briefing  
7 schedule on the Motion for Relief (ECF 280);

8 WHEREAS, the Parties have met and conferred and agreed to the following briefing  
9 schedule on the Motion for Relief;

10 NOW THEREFORE, it is stipulated and agreed among the undersigned Parties, and  
11 respectfully submitted for the Court's approval as follows:

12 1. Plaintiff shall file any opposition to the Motion for Relief, not to exceed five pages,  
13 no later than August 16, 2022; and

14 2. Defendants shall file any reply in support of the Motion for Relief, not to exceed three  
15 pages, no later than August 23, 2022.

16 DATED: August 9, 2022

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Additional Counsel

DATED: August 9, 2022

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and Luca Maestri

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ATTESTATION PURSUANT TO LOCAL RULE 5-1

I, Kenneth J. Black, am the ECF user whose identification and password are being used to file the Stipulation and [Proposed] Order Regarding Briefing Schedule for Defendants' Motion for Relief from Nondispositive Pretrial Order of Magistrate Judge. Pursuant to Local Rule 5-1(h)(3) and in compliance with General Order No. 45 X.B., I hereby attest that Kevin M. Askew has concurred in this filing.

DATED: August 9, 2022

\_\_\_\_\_  
s/ Kenneth J. Black  
KENNETH J. BLACK

\* \* \*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 10, 2022

\_\_\_\_\_  
  
THE HON. YVONNE GONZALEZ ROGERS  
UNITED STATES DISTRICT JUDGE

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