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Timothy Cook and Luca Maestri

[additional counsel appears on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE APPLE INC. SECURITIES
LITIGATION

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

CLASS ACTION

This Document Relates to:

ALL ACTIONS.

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING BRIEFING
SCHEDULES FOR DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
AND THE PARTIES' MOTIONS TO
EXCLUDE EXPERT TESTIMONY**

Hon. Yvonne Gonzalez Rogers

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 September 9, 2022, Defendants filed a Motion for Summary Judgment
6 (Dkt. No. 293);

7 WHEREAS, on September 9, 2022, Lead Plaintiff filed a Motion to Exclude Opinion
8 Testimony of Defendants’ Proposed Experts (Dkt. No. 301), and Defendants filed a Motion to
9 Exclude Expert Testimony (Dkt. No. 292) (collectively, the “*Daubert* Motions”);

10 WHEREAS, the Court’s Case Management Order (Dkt. No. 128) set a deadline of
11 September 9, 2022 for Summary Judgment and *Daubert* Motions, but did not set deadlines for
12 opposition and reply briefing;

13 WHEREAS, the Parties have met and conferred and reached an agreement to set a briefing
14 schedule, subject to the Court’s approval, for Defendants’ Motion for Summary Judgment and the
15 Parties’ *Daubert* Motions;

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

18 1. Lead Plaintiff shall file any opposition to the Motion for Summary Judgment, and
19 the Parties shall file any oppositions to the *Daubert* Motions, no later than October 20, 2022;

20 2. Defendants shall file any reply in support of the Motion for Summary Judgment,
21 and the Parties shall file any replies in support of the *Daubert* Motions, no later than November
22 17, 2022.

23 **IT IS SO STIPULATED.**
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1 Dated: September 12, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

2
3 /s/ James N. Kramer

4 JAMES N. KRAMER

Attorneys for Defendants

Apple Inc., Timothy Cook and Luca Maestri

6 Dated: September 12, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

8 /s/ Shawn A. Williams

9 SHAWN A. WILLIAMS

Counsel for Lead Plaintiff,

10 Norfolk County Council as Administering
Authority of the Norfolk Pension Fund

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12 **CIVIL L.R. 5-1 ATTESTATION**

13 Pursuant to Civil L.R. 5-1(i)(3), I, James N. Kramer, am the ECF user whose ID
14 and password are being used to file this Stipulation and [Proposed] Order Regarding Briefing
15 Schedules for Defendants' Motion for Summary Judgment and the Parties' Motions to Exclude
16 Expert Testimony. In compliance with General Order 45, X.B., I hereby attest that Shawn A.
17 Williams has concurred in this filing.

18
19 /s/ James N. Kramer

20 JAMES N. KRAMER

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23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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26 Dated: September 14, 2022

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28 HONORABLE YVONNE GONZALEZ ROGERS