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STIPULATION AND ORDER RE BRIEFING SCHEDULE

WHEREAS, on October 29, 2024, the Court issued an Order (ECF No. 82) granting Defendants' Motion to Dismiss (ECF No. 69)

Plaintiff's Corrected Amended Complaint for Violations of the Federal Securities Laws (ECF No. 61) in the above-captioned case with leave to amend within 20 days;

WHEREAS, on November 18, 2024, Lead Plaintiff filed a Second Amended Complaint for Violations of the Federal Securities Laws (the "SAC") (ECF No. 85);

WHEREAS, Defendants intend to move to dismiss the SAC;

WHEREAS, the only prior extension sought in this case was the one ordered by the Court, for further time to respond to the initial complaints (ECF Nos. 25 (stipulation), 28 (order));

NOW THEREFORE, IT IS SO STIPULATED, by and between the undersigned, subject to approval of this Court, that the briefing schedule for the motion to dismiss the SAC, will be as follows:

- 1. Defendants shall file a motion to dismiss the SAC no later than December 19, 2024.
- 2. Lead Plaintiff shall file an opposition to the motion to dismiss the SAC no later than January 21, 2025.
- 3. Defendants shall file a reply brief in support of the motion to dismiss the SAC no later than February 4, 2025.

1	4. Pursuant to the PSLRA, "all discovery and other
2	proceedings shall be stayed during the pendency of any
3	motion to dismiss, unless the court finds upon the motion
4	of any party that particularized discovery is necessary,"
5	15 U.S.C. § 78u-4(b)(3)(B). The Parties respectfully
6	request that the Court vacate (or continue, in its
7	discretion) the related deadlines (ECF No. 77):
8	a.December 2, 2024: Last day to file Joint Status
9	Report.
10	b.December 12, 2024: Scheduling Conference.
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12	Dated: 11/21/24 FRESHFIELDS US LLP
13	/s/ Boris Feldman BORIS FELDMAN
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21	Materials, Inc., Richard J. Riley, and John Bissell
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23	Dated: 11/21/24 BRAGAR EAGEL & SQUIRE P.C
24	/s/ Marion C. Passmore, Esq.
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Lead Counsel for the Lead Plaintiff and the Proposed Class

Pursuant to the parties' stipulation, IT IS SO ORDERED:

- 1.Defendants shall file a motion to dismiss the SAC no later than December 19, 2024;
- 2. Lead Plaintiff shall file an opposition to the motion to dismiss the SAC no later than January 21, 2025;
- 3. Defendants shall file a reply brief in support of the motion to dismiss the SAC no later than **February 4, 2025**;
- 4. Hearing on the motion is set for **February 18, 2025** at 1:30 p.m. in Courtroom 5;
- 5. Pursuant to the PSLRA, "all discovery and other proceedings shall be stayed during the pendency of any motion to dismiss, unless the court finds upon the motion of any party that particularized discovery is necessary," 15 U.S.C. § 78u-4(b)(3)(B).
- 6. The Scheduling Conference is reset for **April 7, 2025** at 1:30 p.m. in Courtroom 5; and

7.A Joint Status Report shall be filed no later than March
24 2025 in accordance with the Court's Order Re: Status
(Pretrial Scheduling) Conference filed August 25, 2023
(Docket No. 3).

Dated: November 22, 2024

MILLIAM D. SHIDD

WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE