

1 JORDAN ETH (CA SBN 121617)
 JEth@mofo.com
 2 ANNA ERICKSON WHITE (CA SBN 161385)
 AWhite@mofo.com
 3 CRAIG D. MARTIN (CA SBN 168195)
 CMartin@mofo.com
 4 MORRISON & FOERSTER LLP
 425 Market Street, 32nd Floor
 5 San Francisco, California 94105-2482
 Telephone: 415.268.7000
 6 Facsimile: 415.268.7522

7 Attorneys for Defendants
 Dennis Wu, Joseph J. Jou, Pin Pin Chau, Li-Lin Ko,
 8 Godwin Wong, David Ng, Daniel P. Riley and
 Richard Li-Chung Wang
 9

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION
 13

14 KYUNG CHO; REX DECHAKUL; AND
 15 DAVID HWANG; INDIVIDUALLY AND ON
 BEHALF OF ALL OTHERS SIMILARLY
 16 SITUATED,

17 Plaintiffs,

18 v.

19 UCBH HOLDINGS, INC.; THOMAS S. WU;
 EBRAHIM SHABUDIN; CRAIG ON;
 20 DENNIS WU; ROBERT NAGEL;
 JOHN M. KERR; DANIEL M. GAUTSCH;
 DOUGLAS MITCHELL; BURTON D.
 21 THOMPSON; JOHN CINDEREY; JOSEPH J.
 JOU; PIN PIN CHAU; LI-LIN KO; JAMES
 22 KWOK; QINGYUAN WAN; GODWIN WONG;
 DAVID NG; DANIEL P. RILEY; and RICHARD
 23 LI-CHUNG WANG,

24 Defendants.
 25
 26
 27
 28

Master Case No. CV-09-4208-JSW
 (Consolidated)

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
 ORDER RE: FILING OF THIRD
 AMENDED COMPLAINT AND
 RESPONSE THERETO**

[Civil L.R. 6-1(b)]

Judge: Hon. Jeffrey S. White
 Courtroom: 11, 19th Floor

STIPULATION

1
2 WHEREAS, on May 17, 2011, the Court issued an Order dismissing the Consolidated
3 Amended Complaint and granting Plaintiffs leave to file an amended complaint on or before June
4 24, 2011;

5 WHEREAS, Plaintiffs' deadline to file an amended complaint was extended to July 29,
6 2011;

7 WHEREAS, on July 29, 2011, Plaintiffs filed the Consolidated Second Amended
8 Complaint;

9 WHEREAS, Defendants' deadline to respond to Plaintiffs' Consolidated Second
10 Amended Complaint was extended to December 19, 2011;

11 WHEREAS, Plaintiffs intend to amend their complaint;

12 WHEREAS, Defendants in this action do not oppose the filing of an amended complaint;

13 WHEREAS, Defendants, by not opposing the filing of an amended complaint and by
14 stipulating to the filing of an amended complaint, do not concede that Plaintiffs' Consolidated
15 Second Amended Complaint or any amended complaint adequately pleads a claim, but rather
16 expressly reserve all arguments and defenses they may have as to any amended complaint;

17 NOW, THEREFORE, the Parties stipulate pursuant to Civil Local Rule 6-1(b) and subject
18 to Court approval, as follows:

19 1. Plaintiffs' Consolidated Third Amended Complaint shall be filed on or before
20 January 9, 2012.

21 2. Defendants' responses to the Consolidated Third Amended Complaint shall be
22 filed on or before February 23, 2012.

23 3. If Defendants file motions to dismiss the Consolidated Third Amended Complaint,
24 Plaintiffs' opposition briefs will be due on or before April 9, 2012.

25 4. Defendants' reply briefs will be due on or before May 9, 2012.

26 5. Defendants shall notice their motions for hearing on June 1, 2012, at 9:00 a.m.

27 IT IS SO STIPULATED.
28

1 Dated: December 7, 2011

THE ROSEN LAW FIRM, P.A.

2

3

By: /s/ Phillip Kim

PHILLIP KIM

4

Attorneys for Lead Plaintiff Kyung Cho
and Lead Counsel for Plaintiffs

5

6

7 Dated: December 7, 2011

JORDAN ETH
ANNA ERICKSON WHITE
CRAIG D. MARTIN
MORRISON & FOERSTER LLP

8

9

10

By: /s/ Anna Erickson White

ANNA ERICKSON WHITE

11

12

Attorneys for Dennis Wu, Joseph J. Jou,
Pin Pin Chau, Li-Lin Ko, Godwin Wong,
David Ng, Daniel P. Riley and Richard
Li-Chung Wang, Craig On

13

14

15

16 Dated: December 7, 2011

LATHAM & WATKINS LLP

17

18

By: /s/ Timothy P. Crudo

Timothy P. Crudo

19

Attorneys for Defendant Thomas S. Wu

20

21

22 Dated: December 7, 2011

FARELLA BRAUN + MARTEL LLP

23

24

By: /s/ Anthony P. Schoenberg

Anthony P. Schoenberg

25

Attorneys for Defendant John M. Kerr

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: December 7, 2011

ROPER, MAJESKI, KOHN & BENTLEY

By: /s/ James A. Lassart
James A. Lassart

Attorneys for Defendant Ebrahim
Shabudin

Dated: December 7, 2011

BERGESON LLP

By: /s/ Daniel J. Bergeson
Daniel J. Bergeson

Attorneys for Defendants Daniel M.
Gautsch, Douglas Mitchell, and Robert
Nagel

Dated: December 7, 2011

K&L GATES LLP

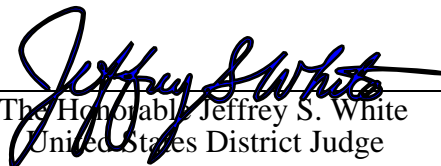
By: /s/ Jeffrey L. Bornstein
Jeffrey L. Bornstein

Attorneys for Defendant Burton
Thompson

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 8, 2011


The Honorable Jeffrey S. White
United States District Judge