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 7 Rosenberg Research Center LLC

8 [Additional Counsel Appear on Signature Page]

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

THE GOVERNMENT OF GUAM
 RETIREMENT FUND; THE SACRAMENTO
 COUNTY EMPLOYEES' RETIREMENT
 SYSTEM; THE BOARD OF TRUSTEES OF
 THE NATIONAL ELEVATOR INDUSTRY
 HEALTH BENEFIT FUND; and THE BOARD
 OF TRUSTEES OF THE PIPEFITTERS
 LOCAL 636 DEFINED BENEFIT PENSION
 FUND, both individually and on behalf of all
 others similarly situated,

Plaintiff,

v.

AXA ROSENBERG GROUP LLC, AXA
 ROSENBERG INVESTMENT
 MANAGEMENT LLC, BARR ROSENBERG
 RESEARCH CENTER LLC, and BARR
 ROSENBERG,

Defendants.

Lead Case No. C 11-00536 JSW
 Case No. CV11-0897

**JOINT STIPULATION AND
 [PROPOSED] ORDER NO. 3**

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

1 WHEREAS, on March 15, 2011, the Court entered an Initial Scheduling Conference
2 Order (“the March 15, 2011 Order”) in the putative class action captioned the *Government of*
3 *Guam Retirement Fund v. AXA Rosenberg Group LLC, AXA Rosenberg Investment Management*
4 *LLC, and Barr Rosenberg Research Center LLC*, Case No. C 11-00536 (“the Guam Action”), in
5 which the Court set the Case Management Conference for May 27, 2011 and ordered a Case
6 Management Statement by May 20, 2011;

7 WHEREAS, on March 17, 2011, the parties moved to relate the Guam Action with
8 another putative class action filed in the Northern District of California captioned *The Board of*
9 *Trustees of the National Elevator Industry Health Benefit Fund v. AXA Rosenberg Group, LLC,*
10 *et al.*, Case No. 4:11-cv-00897 (“NEI Health Benefit Fund Action”) and informed the Court that
11 Plaintiffs in the Guam Action and NEI Health Benefit Fund Action intended to file a
12 consolidated complaint;

13 WHEREAS, on March 18, 2011, the Court granted the parties’ motion to relate the NEI
14 Health Benefit Fund Action to the Guam Action (“Related Cases”) and further entered an order
15 (“Order No. 2”) that, among other things, (1) vacated the deadlines set forth in the Court’s
16 previous order in the Guam Action dated February 24, 2011 (“Order No. 1”); (2) ordered
17 Plaintiffs to file a Consolidated Complaint by April 15, 2011 and ordered Defendants to answer,
18 move, or otherwise respond to the Consolidated Complaint by May 30, 2011; and (3) ordered the
19 parties to hold the conference required by Rule 26(f) of the Federal Rules of Civil Procedure no
20 later than June 17, 2011;

21 WHEREAS, on April 15, 2011, Plaintiffs filed a Consolidated Complaint against
22 Defendants;

23 WHEREAS, pursuant to the Court’s Order No. 2, Defendants plan to move to dismiss
24 Plaintiffs’ Consolidated Complaint by May 30, 2011;

25 WHEREAS, pursuant to the Court’s Order No. 2, Plaintiffs and Defendants will hold the
26 discovery conference required by Rule 26(f) no later than June 17, 2011;

27 WHEREAS, Rule 26(f)(1) requires that parties meet and confer at least 21 days before a
28 scheduling conference is to be held or a scheduling order is due under Rule 16(b);

1 WHEREAS, pursuant to the Court's March 15, 2011 Order, the Case Management
2 Conference for the Guam Case remains scheduled for May 27, 2011, which is three weeks before
3 the parties' deadline for holding a Rule 26(f) conference.

4 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the
5 Parties hereto, with the Court's permission, that:

- 6 1. The deadlines set forth in the Court's March 15, 2011 Order in the Guam
7 Action for the Case Management Conference are vacated.
- 8 2. The Case Management Conference in the Related Cases required by Local
9 Rule 16-2(a) shall be held before the Court on Friday, July 15, 2011 at 1:30 p.m.,
10 or at a later date at the Court's convenience.
- 11 3. The Case Management Statement required by Local Rule 16-9 shall be
12 filed by July 8, 2011.

13 Dated: May 12, 2011

Respectfully submitted,
MAYER BROWN LLP

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*Counsel for Defendants
AXA Rosenberg Group LLC, AXA Rosenberg
Investment Management LLC, and Barr
Rosenberg Research Center LLC*

22 Dated: May 12, 2011

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24 /s/ Blair A. Nicholas
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Co-Lead Interim Counsel for the Proposed Class

1 Dated: May 12, 2011

LIEFF CABRASER HEIMANN & BERNSTEIN
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3 /s/ Kelly M. Dermody

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7 *Co-Lead Interim Counsel for the Proposed Class*

8 Dated: May 12, 2011

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13 *Counsel for Defendant Barr Rosenberg*

14 [PROPOSED ORDER]

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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18 DATED: May 13, 2011


HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE

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21 CERTIFICATION UNDER GENERAL ORDER NO. 45

22 I, Lee H. Rubin, am the ECF User whose ID and password are being used to file this
23 Joint Stipulation and [Proposed] Order. In compliance with General Order No. 45, X.B., I attest
24 that Blair A. Nicholas, Kelly M. Dermody, and Jonathan Bass have concurred in this filing.
25

26 Dated: May 12, 2011

27 /s/ Lee H. Rubin
LEE H. RUBIN