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7 *Attorneys for the Government of*
 8 *Guam Retirement Fund*

9 [Additional Counsel Appear on Signature Page]

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

The Government of Guam Retirement Fund,
 individually, and on behalf of all others
 similarly situated,

 Plaintiff,

 v.

 AXA Rosenberg Group LLC, AXA Rosenberg
 Investment Management LLC, and Barr
 Rosenberg Research Center LLC,

 Defendants.

Case No. C 11-00536 EMC

 JOINT STIPULATION AND [PROPOSED]
 ORDER

 Courtroom: C, 15th Floor
 Judge: Edward M. Chen

1 WHEREAS, on February 3, 2011, Plaintiff the Government of Guam Retirement Fund
2 filed a Class Action Complaint (the “Complaint”) against Defendants AXA Rosenberg Group
3 LLC, AXA Rosenberg Investment Management LLC, and Barr Rosenberg Research Center LLC
4 for (1) breach of fiduciary duty; (2) negligence/gross negligence; and (3) an accounting.

5 WHEREAS, the deadline for Defendants to answer, move, or otherwise respond to the
6 Complaint is currently February 28, 2011.

7 WHEREAS, counsel to the parties have met and conferred regarding (i) extending the
8 deadline for Defendants to answer, move, or otherwise respond to the Complaint; (ii) scheduling
9 the earliest practicable date for the parties to confer pursuant to Rule 26(f) of the Federal Rules
10 of Civil Procedure (“Rules”); and (iii) designation of Plaintiff’s counsel as interim lead counsel
11 for the putative class pursuant to Rule 23(g)(3) to aid in the orderly and efficient development of
12 the case.

13 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the
14 Parties hereto, with the Court’s permission, that:

- 15 1. Defendants shall, by March 25, 2011, answer, move, or otherwise respond to the
16 Complaint.
- 17 2. If Defendants move to dismiss one or more claims in the Complaint, opposition
18 papers shall be filed by Plaintiff within 30 days from the filing of the motion to
19 dismiss. Any reply by Defendants shall be filed within 14 days of the filing of
20 the opposition.
- 21 3. The parties shall hold the conference required by Rule 26(f) of the Federal Rules
22 of Civil Procedure no later than April 15, 2011.
- 23 4. Bernstein Litowitz Berger & Grossman LLP is appointed interim lead plaintiff’s
24 counsel for the putative class (“Interim Lead Counsel”). Defendants take no
25 position on the appointment of Bernstein Litowitz Berger & Grossman LLP as
26 Interim Lead Counsel but if so appointed, Defendants’ counsel may rely upon all
27 agreements made with Interim Lead Counsel.
28

1 Dated: February 22, 2011

Respectfully submitted,

2 BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

3
4 /s/ Blair A. Nicholas

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9 *Attorneys for Plaintiff the Government of
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10 Dated: February 22, 2011

MAYER BROWN LLP

11
12 /s/ Lee H. Rubin

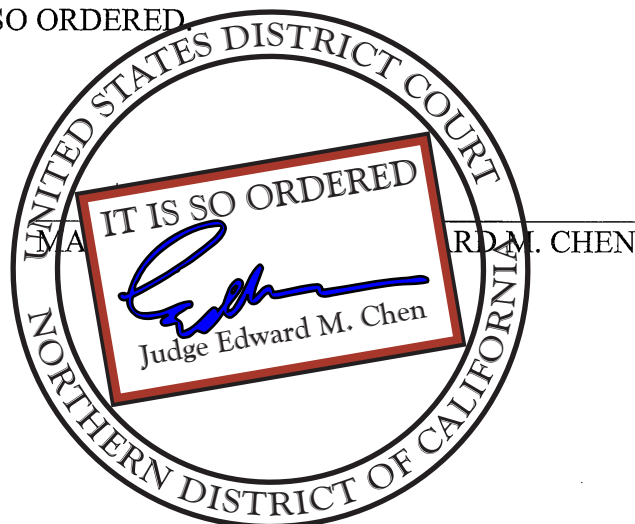
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17 *Attorneys for Defendants AXA Rosenberg Group
18 LLC, AXA Rosenberg Investment Management LLC,
and Barr Rosenberg Research Center*

19
20 **[PROPOSED ORDER]**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED

22
23 DATED: 2/24, 2011



CERTIFICATION UNDER GENERAL ORDER NO. 45

I, Blair A. Nicholas, am the ECF User and whose ID and password are being used to file this Joint Stipulation and [Proposed] Order. In compliance with General Order No. 45, X.B., I attest that Lee H. Rubin has concurred in this filing.

Dated: February 22, 2011

/s/Blair A. Nicholas

BLAIR A. NICHOLAS

Mailing Information for Case No. C11-0536 EMC

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- Blair A. Nicholas
blairn@blbglaw.com

Manual Notice List

The following is the list of attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual noticing).

- Lee H. Rubin
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