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7 Lead Counsel for Plaintiff

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 CEMENT MASONS & PLASTERERS JOINT)	No. 3:11-cv-01016-SC
PENSION TRUST, Individually and on Behalf)	
11 of All Others Similarly Situated,)	<u>CLASS ACTION</u>
12)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
13 vs.)	REGARDING SCHEDULE FOR FILING OF
14 EQUINIX, INC., et al.,)	SECOND AMENDED COMPLAINT
15)	
Defendants.)	
16)	

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1 WHEREAS on March 2, 2012, the Court issued an Order Granting Defendants’ Motion to
2 Dismiss plaintiffs’ Amended Complaint for Violation of the Federal Securities Laws (the “Order”)
3 (Dkt. No. 40);

4 WHEREAS the Order provides that plaintiffs may file a further amended complaint within
5 30 days of March 2, 2012 (*id.*);

6 WHEREAS plaintiffs’ investigation is continuing and has uncovered additional facts
7 relevant to the issues alleged in plaintiffs’ Amended Complaint for Violation of the Federal
8 Securities Laws (Dkt. No. 26);

9 WHEREAS plaintiffs will determine whether the additional facts will together address the
10 specific deficiencies identified by the Court in the Order;

11 WHEREAS the parties have met and conferred through their respective counsel of record and
12 agreed to extend the date by which plaintiffs must determine whether to file an amended complaint;

13 NOW THEREFORE, it is hereby stipulated between plaintiffs and defendants as follows:

14 1. Plaintiffs shall have until May 2, 2012, to determine whether additional facts
15 uncovered address the pleading deficiencies identified in the Order.

16 2. In the event that plaintiffs decide to file a second amended complaint, the complaint
17 shall be filed no later than May 2, 2012. If a second amended complaint is not filed by that date, the
18 action will be dismissed with prejudice.

19 3. If plaintiffs file a second amended complaint on or before May 2, 2012, defendants
20 shall have until June 15, 2012 in which to move, answer or otherwise respond to the second amended
21 complaint. If defendants move to dismiss plaintiffs’ second amended complaint, plaintiffs shall have
22 until July 31, 2012 to oppose defendants’ motion, and defendants shall have until August 30, 2012 to
23 reply to plaintiffs’ opposition. The hearing on such motion to dismiss will be set for a date thereafter
24 that is mutually acceptable to the parties and the Court.

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1 DATED: March 15, 2012

ROBBINS GELLER RUDMAN
& DOWD LLP
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s/ Shawn A. Williams
SHAWN A. WILLIAMS

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Lead Counsel for Plaintiff

DATED: March 15, 2012

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Attorneys for Defendants Equinix, Inc., Stephen
M. Smith and Keith D. Taylor

I, Shawn A. Williams, am the ECF User whose identification and password are being used to file the Stipulation and [Proposed] Order Regarding Schedule for Filing of Second Amended Complaint. In compliance with General Order 45.X.B, I hereby attest that Kevin P. Muck has concurred in this filing.

Dated: March 15, 2012

By: _____
s/ Shawn A. Williams
SHAWN A. WILLIAMS

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* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE SAMUEL CONTI
UNITED STATES DISTRICT JUDGE

1 CERTIFICATE OF SERVICE

2 I hereby certify that on March 15, 2012, I authorized the electronic filing of the foregoing
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to
4 the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-
6 CM/ECF participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on March 15, 2012.

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10 s/ Shawn A. Williams
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Mailing Information for a Case 3:11-cv-01016-SC

Electronic Mail Notice List

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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). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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