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12 UNITED STATES DISTRICT COURT
 13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 14 SAN FRANCISCO DIVISION
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 17 DR. DAN OLIVER, JEANNIE OLIVER, JOE)
 SOLO, BERNARD GROSS, SUSAN KEELIN,)
 18 WALTER KVASNIK, KOU)
 SRIMOUNGHANCH, HUMBERTO)
 19 GONZALEZ, SAMUEL D. LEGGETT, BRIAN)
 ALBEE, MARY LOUISE FOWLER, JOE)
 20 SHAW, and RHONDA SCHULTZ, on their)
 own behalves and on behalf of all others)
 21 similarly situated,)
 22 Plaintiffs,)
 23 v.)
 24 SD-3C, LLC; PANASONIC CORP.;)
 PANASONIC CORP. OF NORTH AMERICA;)
 25 TOSHIBA CORP.; TOSHIBA AMERICA)
 ELECTRONIC COMPONENTS, INC.; and)
 26 SANDISK CORP.,)
 27 Defendants.)

No. CV-11-1260 JSW

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO SET
 MOTION TO DISMISS BRIEFING
 SCHEDULE AND PAGE LIMITS AND
 TO STAY DISCOVERY**

1 WHEREAS on June 27, 2011, the indirect purchaser plaintiffs (collectively “Plaintiffs”) and
2 defendants Panasonic Corporation, Panasonic Corporation of North America, Toshiba Corporation,
3 Toshiba America Electronic Components, Inc., SD-3C, LLC, and SanDisk Corporation
4 (collectively, “Defendants”) filed a Joint Stipulation to Extend Time Within Which to Respond to
5 Complaint Pursuant to Local Rule 6-1(a), which provided that Defendants’ time to respond to an
6 amended complaint filed by Plaintiffs would be extended to include the ninetieth (90th) day after
7 the filing date of such an amended complaint;

8 WHEREAS on November 23, 2011, Plaintiffs filed their First Amended Complaint;

9 WHEREAS, pursuant to the June 27, 2011 stipulation among the parties, the time for
10 Defendants to respond to the First Amended Complaint was extended to February 21, 2012, which
11 is the ninetieth day after the Plaintiffs filed the First Amended Complaint;

12 IT IS HEREBY FURTHER STIPULATED BY AND BETWEEN THE PARTIES

13 HERETO, through their respective counsel, subject to the approval of the Court, that:

14 (1.) Defendants may file a single joint motion to dismiss the Plaintiffs’ First Amended
15 Complaint and a consolidated memorandum of points and authorities in support of their joint
16 motion; Plaintiffs may file a single opposition to Defendants’ joint motion to dismiss; and
17 Defendants may file a single consolidated reply to Plaintiffs’ opposition.

18 (2.) Pursuant to Local Rule 6-2(a), the time for Plaintiffs to file their opposition to
19 Defendants’ joint motion to dismiss shall be extended to and include the forty-fifth (45th) day after
20 the date on which Defendants file their joint motion to dismiss.

21 (3.) Pursuant to Local Rule 6-2(a), the time for Defendants to file their consolidated
22 reply to Plaintiffs’ opposition to Defendants’ joint motion to dismiss shall be extended to and
23 include the twenty-fifth (25th) day after the date on which Plaintiffs file their opposition.

24 (4.) Defendants shall have a page limit of ^{forty (40)}~~fifty (50)~~ pages for their consolidated brief in
25 support of their joint motion to dismiss (notwithstanding that the six defendants would be entitled
26 to an aggregate of ninety pages, or fifteen pages each, pursuant to the Court’s Civil Standing
27 Orders); Plaintiffs shall have a page limit of ^{forty (40)}~~fifty (50)~~ pages for their brief in opposition; and
28 Defendants shall have a page limit of ^{twenty-five (25)}~~thirty (30)~~ pages for their consolidated brief in reply.

1 (5.) The stay of discovery in this case, which has been in effect pursuant to a stipulation
2 among the parties that was So Ordered by the Court on June 28, 2011, shall be extended pursuant to
3 Local Rule 6-2(a), and all discovery in this action shall be stayed through the ninetieth (90th) day
4 after the Court enters an Order resolving the Defendants' joint motion to dismiss Plaintiffs' First
5 Amended Complaint, unless Plaintiffs file a Second Amended Complaint, in which case discovery
6 shall be stayed until the Court enters an Order resolving the Defendants' joint motion to dismiss
7 Plaintiffs' Second Amended Complaint.

8 (6.) No party shall serve requests for discovery until the stay has expired.

9 (7.) The parties shall not be required to serve initial disclosures, pursuant to Federal Rule
10 of Civil Procedure 26(a), until the stay of discovery has expired.

11 (8.) This Stipulation is made without prejudice to any party's right to move to extend the
12 stay of discovery.

13 (9.) The parties agree and stipulate that they will confer and propose to the Court a date
14 for the Case Management Conference and associated discovery and ADR obligations after the stay
15 requested herein expires.

16 (10.) This Stipulation applies to this proceeding only.
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1 Dated: February 2, 2012

Respectfully submitted,

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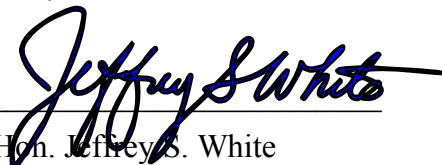
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*Pursuant to General Order No. 45 § X.B., the filer attests that concurrence
in the filing of this document has been obtained from the above signatories.*

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 13, 2012


Hon. Jeffrey S. White
United States District Court Judge