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12 Attorneys for Defendants

13  
 14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

18 JAMES EFIRD, individually and on behalf of all  
 19 others similarly situated,

20 Plaintiff,

21 v.

22 SONY COMPUTER ENTERTAINMENT  
 AMERICA, LLC, a Delaware limited liability  
 company; SONY COMPUTER  
 23 ENTERTAINMENT AMERICA, INC., a  
 Delaware corporation; SONY CORPORATION  
 24 OF AMERICA, a New York corporation; and  
 DOES 1 through 10, inclusive,

25 Defendants.  
 26  
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Case No. 3:11-cv-02115-JCS

**STIPULATION TO EXTEND  
 TIME FOR DEFENDANTS TO  
 MOVE, ANSWER, OR  
 OTHERWISE RESPOND TO  
 COMPLAINT**

Judge: Magistrate Judge Joseph C. Spero

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) (f/k/a  
2 Sony Computer Entertainment America, Inc.) and Sony Corporation of America (“SCA”), as well  
3 as certain related entities (collectively, the “Sony Defendants”), have been named as defendants  
4 in at least twenty-one (21) putative class action lawsuits within this District, to date;

5 WHEREAS, certain of the Sony Defendants have also been named as defendants in at  
6 least eighteen (18) putative class action lawsuits pending outside this District, to date;

7 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict  
8 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed  
9 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,  
10 2011.

11 WHEREAS, the current deadline for SCEA and SCA to respond to the Complaint is  
12 June 1, 2011;

13 WHEREAS, the parties have agreed to the extension of time herein for the defendants in  
14 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to  
15 facilitate the scheduling of this matter in coordination with the schedule for the motion before the  
16 JPML;

17 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,  
18 by and through their respective counsel, hereby stipulate as follows:

19 The deadline for the defendants to respond to the Complaint in the above-captioned action  
20 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict  
21 litigation centralizing the above-captioned action with other matters, or if centralization is denied  
22 by the JPML, then 30 days from the date of such order denying centralization.

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1 Either party may seek ex parte relief from this stipulated Order for good cause shown,  
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3  
4 Dated: May 19, 2011

SEAN REIS  
JAY EDELSON  
MICHAEL J. ASCHENBRENER  
BRADLEY M. BAGLIEN  
CHRISTOPHER L. DORE  
EDELSON MCGUIRE, LLP

7 By: /s/ Jay Edelson /s/ [as authorized]  
8 Jay Edelson  
9 Attorneys for Plaintiff  
JAMES EFIRD

10 Dated: May 19, 2011

HARVEY WOLKOFF  
THAD A. DAVIS  
ROCKY C. TSAI  
ROPES & GRAY LLP

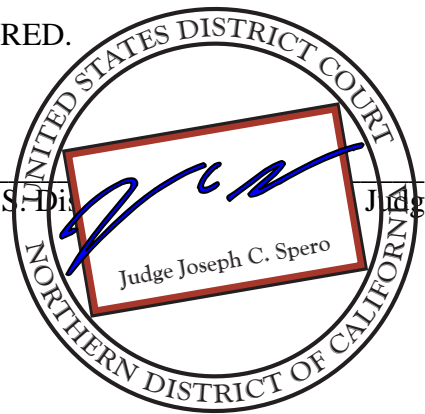
14 By: /s/ Rocky C. Tsai /s/  
15 Rocky C. Tsai  
16 Attorneys for Defendants  
17 SONY NETWORK ENTERTAINMENT  
18 AMERICA, INC.; SONY COMPUTER  
ENTERTAINMENT AMERICA LLC;  
SONY NETWORK ENTERTAINMENT  
INTERNATIONAL LLC

19 **[PROPOSED] ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21  
22 Dated: 5/20/11

By: [Signature]  
U. S. District Judge



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