

1 THAD A. DAVIS (SBN 220503)
 thad.davis@ropesgray.com
 2 ROCKY C. TSAI (SBN 221452)
 rocky.tsai@ropesgray.com
 3 ROPES & GRAY LLP
 Three Embarcadero Center, Ste 300
 4 San Francisco, California 94111-4006
 Tel: (415) 315- 6300
 5 Fax: (415) 315-6350

6 HARVEY J. WOLKOFF (Subject to admission *pro hac vice*)
 harvey.wolkoff@ropesgray.com
 7 MARK P. SZPAK
 mark.szpak@ropesgray.com
 8 LARA A. ORAVEC
 lara.oravec@ropesgray.com
 9 ROPES & GRAY LLP
 Prudential Tower, 800 Boylston Street
 10 Boston, MA 02199-3600
 Tel: (617) 951-7606
 11 Fax: (617) 235-0215

12 Attorneys for Defendants

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION
 17

18 FRANK TURANO, on Behalf of Himself and All
 19 Others Similarly Situated,

20 Plaintiff,

21 v.

22 SONY CORPORATION OF AMERICA, SONY
 23 COMPUTER ENTERTAINMENT AMERICA,
 INC., SONY COMPUTER ENTERTAINMENT
 24 AMERICA LLC, and SONY NETWORK
 ENTERTAINMENT AMERICA, INC.,

25 Defendants.
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Case No. 4:11-cv-02206-SC

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

Judge: Hon. Samuel Conti

27 WHEREAS, defendants Sony Corporation of America (“SCA”), Sony Computer

28 Entertainment America LLC (“SCEA”) (f/k/a Sony Computer Entertainment America, Inc.) and

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
 RESPOND TO COMPLAINT
 CASE NO. 4:11-cv-02206-SC

1 Sony Network Entertainment America, Inc. (“SNEA”), as well as certain related entities
2 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-five (25)
3 putative class action lawsuits within this District, to date;

4 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
5 least nineteen (19) putative class action lawsuits pending outside this District, to date;

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

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

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

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

18 The deadline for the defendants to respond to the Complaint in the above-captioned action
19 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
20 litigation centralizing the above-captioned action with other matters, or if centralization is denied
21 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.

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4 Dated: May 24, 2011

JEFF S. WESTERMAN
DAVID E. AZAR
MILBERG LLP

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6 By: /s/ David E. Azar /s/ [as authorized]
David E. Azar
Attorneys for Plaintiff
FRANK TURANO

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8
9 Dated: May 24, 2011

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

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11 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

12
13 Attorneys for Defendants
14 SONY CORPORATION OF AMERICA,
15 SONY COMPUTER
16 ENTERTAINMENT AMERICA LLC,
and SONY NETWORK
ENTERTAINMENT AMERICA, INC.

17 ~~PROPOSED~~ ORDER

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated: May 26, 2011

20 By: _____
U. S. District Court



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