

1 Mark A. Chavez (SBN 90858)
 2 Nance F. Becker (SBN 99292)
 3 CHAVEZ & GERTLER LLP
 4 42 Miller Avenue
 5 Mill Valley, CA 94941
 6 P: 415.381.5599
 7 mark@chavezgertler.com
 8 nance@chavezgertler.com
 9 *Additional Counsel Listed on Signature Page*
 10 Attorneys for Plaintiffs

7 Rocky C. Tsai (SBN 221452)
 8 ROPES & GRAY LLP
 9 Three Embarcadero Center, Suite 300
 10 San Francisco, CA 94111-4006
 11 P: 415.315.6358
 12 rocky.tsai@ropesgray.com
 13 Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

15 QUENTIN REAVES, DANIELLE
 16 BOGAN, and ROBERT MAYO, on behalf
 17 of themselves and all others similarly
 18 situated,
 19 Plaintiffs,
 20 v.
 21 SONY COMPUTER ENTERTAINMENT
 22 AMERICA LLC, a Delaware Limited
 23 Liability Company; and SONY
 24 NETWORK ENTERTAINMENT
 25 INTERNATIONAL LLC, a Delaware
 26 Limited Liability Company.
 27 Defendants.

CASE NO.: 11-cv-02254-EMC

CLASS ACTION

**JOINT STIPULATION AND
 [PROPOSED] ORDER FOR
 LITIGATION STAY PENDING
 RESOLUTION OF THE JUDICIAL
 PANEL ON MULTIDISTRICT
 LITIGATION'S DECISION ON
 TRANSFER ; ORDER RESETTING CMC**

1 WHEREAS, on May 6, 2011, Plaintiffs, Quentin Reaves, Danielle Bogan and Robert Mayo
2 ("Plaintiffs") filed a class action complaint against Sony Computer Entertainment America LLC
3 and Sony Network Entertainment International LLC ("Defendants") (collectively, the "Parties");

4 WHEREAS, Defendants, as well as certain related entities (collectively, the "Sony
5 Defendants"), have been named as defendants in at least 61 related class action lawsuits, including
6 this action, pending in district courts throughout the United States;

7 WHEREAS, a motion pursuant to 28 U.S.C. §1407 is currently pending before the Judicial
8 Panel on Multidistrict Litigation (the "Panel") to centralize this action and the other referenced
9 matters. A hearing on the motion for centralization in *In Re: Sony Gaming Networks and*
10 *Customer Data Security Breach Litigation* (MDL No. 2258) is scheduled before the Panel on July
11 28, 2011, in San Francisco, California;

12 WHEREAS, a ruling is expected from the Panel within a short period of time after the
13 hearing, such that any stay of proceedings in this case is expected to be limited in duration. The
14 parties will promptly advise the Court regarding the Panel's resolution of the motion to centralize
15 the related matters;
16

17 WHEREAS, based on the Court's May 6, 2011 Order Settling Initial Case Management
18 Conference and ADR Deadlines, (Docket No. 3), there are several imminent deadlines in this case,
19 including July 27, 2011 to meet and confer pursuant to Rule 26(f) and to file an ADR Certification;
20 August 10, 2011 to file a Rule 26(f) Report; and August 17, 2011 for an Initial Case Management
21 Conference;
22

23 WHEREAS, on July 19, 2011, counsel for Plaintiffs and Defendants' counsel met and
24 conferred by email, and agreed to a litigation stay, subject to approval of the Court.
25

26 IT IS THEREFORE STIPULATED AND AGREED, by and between the undersigned,
27 subject to approval of the Court, that all proceedings in this case are stayed pending the Judicial
28

1 Panel on Multidistrict Litigation's ruling upon the motion to centralize the related matters and, if
2 centralized, such further scheduling as may be set by the Court before which the related matters are
3 centralized. A stay of this action will not prejudice any of the parties and will conserve judicial
4 time and resources by avoiding duplicative litigation if the cases are ultimately centralized by the
5 Panel.

6 DATED: July 25, 2011

7 Respectfully submitted,
8 By the Plaintiffs,
9 CHAVEZ & GERTLER LLP

10 /s/ Mark A. Chavez
11 Mark A. Chavez (SBN 90858)
12 42 Miller Avenue
13 Mill Valley, CA 94941
14 P: 415.381.5599
15 mark@chavezgertler.com

16 Respectfully submitted,
17 By the Defendants,

18 /s/ Rocky C. Tsai
19 Rocky C. Tsai (SBN 221452)
20 Ropes & Gray LLP
21 Three Embarcadero Center, Suite 300
22 San Francisco, CA 94111-4006
23 P: 415.315.6358
24 F: 415.315.6350
25 rocky.tsai@ropesgray.com

26 **Additional Counsel for Plaintiffs**

27 RODDY KLEIN & RYAN
28 Gary Klein (to be admitted *Pro Hac Vice*)
Shennan Kavanagh (to be admitted *Pro Hac*
Vice)
727 Atlantic Avenue, 2nd Floor
Boston, MA 02111
P: 617.357.5500
F: 617.357.5030
klein@rododykleinryan.com
kavanagh@rododykleinryan.com

EAGAN, DONOHUE, VAN DYKE &
FALSEY, LLP
Peter Van Dyke (to be admitted *Pro Hac*
Vice)
24 Arapahoe Road
West Hartford, CT 06107
P: 860.232.7200
F: 860.232.0214
pvd@eddf-law.com

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation for Litigation Stay Pending the Resolution of the Judicial Panel on Multidistrict Litigation's decision on transfer. Good cause appearing, the Court hereby enters the Parties' Stipulation. All proceedings in this case are accordingly stayed pending the Judicial Panel on Multidistrict Litigation's decision on transfer. The parties shall promptly advise the Court regarding the Panel's resolution of the motion to centralize the related matters . The CMC set for 8/17/11 is reset for 1/27/12 at 9:00 a.m. A joint CMC statement shall be filed by 1/20/12.

IT IS SO ORDERED.

Dated: 7/28 , 2011

Honorable Edward M. Chen
UNITED STATES DISTRICT COURT



