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Co-Lead Counsel for Plaintiffs

12 UNITED STATES DISTRICT COURT  
 13  
 14 NORTHERN DISTRICT OF CALIFORNIA

15 PIRELLI ARMSTRONG TIRE )  
 CORPORATION RETIREE MEDICAL )  
 BENEFITS TRUST, Derivatively on Behalf of )  
 16 WELLS & FARGO COMPANY, )

Plaintiff,

vs.

19 JOHN G. STUMPF, et al.,

Defendants,

- and -

22 WELLS FARGO & COMPANY, a Delaware )  
 corporation, )  
 23

Nominal Defendant.

No. 3:11-cv-02369-SI

(Consolidated)

STIPULATION AND ~~PROPOSED~~ ORDER  
 SETTING DATE FOR AMENDED  
 COMPLAINT

1 WHEREAS, between May 25, 2011 and June 21, 2011, six shareholder derivative actions  
2 were filed on behalf of Wells Fargo & Company, naming various individual and entity defendants.

3 WHEREAS, on August 3, 2011, the Court issued an Order Granting Unopposed Motions to  
4 Consolidate Related Actions; Appointing Co-Lead Plaintiffs and Co-Lead Counsel, and ordered  
5 plaintiffs to file a master complaint for the consolidated cases by August 19, 2011.

6 WHEREAS, on August 9, 2011, counsel for plaintiff in one of the consolidated actions,  
7 *Cottrell v. Stumpf*, No. 11-cv-3006-SI, filed a Request for Voluntary Dismissal of *Cottrell* Action  
8 pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Said request was granted by Order of the court entered  
9 on August 12, 2011.

10 WHEREAS, on August 15, 2011, counsel for plaintiff, in another of the consolidated actions,  
11 *IBEW Local Union 98 and Louisiana Municipal Police Employees Retirement System v. Stumpf*,  
12 No. 11-CV-2662-SI, filed a Request of Plaintiffs Louisiana Municipal Police Employees Retirement  
13 System and IBEW Local Union 98 for Voluntary Dismissal of *LAMPERS* Action Pursuant to Fed. R.  
14 Civ. P. 41(a)(1)(A)(i).

15 WHEREAS, on August 15, 2011, counsel for plaintiff in consolidated action *Gorberg v.*  
16 *Stumpf*, No. 11-CV-2577-SI, filed a Request for Voluntary Dismissal of *Gorberg* Action pursuant to  
17 Fed. R. Civ. P. 4(a)(1)(A)(i).

18 WHEREAS, the parties, through their counsel, have met and conferred regarding the scope  
19 of the current allegations and agreed to setting the date for filing of a consolidated complaint.

20 NOW THEREFORE, the undersigned parties, by and through their counsel of record,  
21 stipulate as follows subject to the approval of the Court:

22 Lead Plaintiffs shall file and serve a Consolidated Complaint no later than September 12,  
23 2011.

24 DATED: August 19, 2011

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SHAWN A. WILLIAMS

27 s/ Shawn A. Williams  
28 SHAWN A. WILLIAMS

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Co-Lead Counsel for Plaintiffs

DATED: August 19, 2011

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GILBERT R. SEROTA  
SARAH A. GOOD  
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\_\_\_\_\_  
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G. Swenson*

1 DATED: August 19, 2011

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I, Shawn Williams, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Setting Date for Amended Complaint and Setting Briefing Schedule for Motion to Dismiss. In compliance with General Order 45, X.B., I hereby attest that Sarah A. Good and Kent M. Roger have concurred in this filing.

s/ Shawn A. Williams

SHAWN A. WILLIAMS

PURSUANT TO STIPULATION, IT IS SO ORDERED.



DATED: 8/25/11

THE HONORABLE SUSAN ILLSTON  
UNITED STATES DISTRICT JUDGE



## Mailing Information for a Case 3:11-cv-02369-SI

### Electronic Mail Notice List

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### Manual Notice List

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