1 2	thad.davis@ropesgray.com 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 7	HARVEY J. WOLKOFF harvey.wolkoff@ropesgray.com MARK P. SZPAK	
8	mark.szpak@ropesgray.com LARA A. ORAVEC	
9	lara.oravec@ropesgray.com ROPES & GRAY LLP	
10	Prudential Tower, 800 Boylston Street Boston, MA 02199-3600	
11	Tel: (617) 951-7606 Fax: (617) 235-0215	
12	Attorneys for Defendants	
13		
14	UNITED STATES DIST	RICT COURT
15	NORTHERN DISTRICT O	F CALIFORNIA
16	SAN FRANCISCO I	DIVISION
17		
18		Case No. 3:11-cv-02417-MEJ
19	himself and others similarly situated,	STIPULATION TO EXTEND
20	Plaintiffs,	TIME FOR DEFENDANTS TO MOVE, ANSWER, OR OTHERWISE RESPOND TO
21	SONY COMPUTER ENTERTAINMENT AMERICA LLC, and SONY NETWORK ENTERTAINMENT INTERNATIONAL LLC, Defendants.	COMPLAINT
22		Judge: Magistrate Judge Maria-Elena James
23		Janes
24	Defendants.	
25		
26	WHEREAS, defendants Sony Computer Entert	ainment America LLC ("SCEA") and
27	Sony Network Entertainment International LLC ("SNE	EI") have been named as defendants in at
28	least twenty-five (25) putative class action lawsuits within this District, to date; STIPULATION TO EXTEND TIME FOR DEFENDANTS TO	
	26709346_1.DOC	RESPOND TO COMPLAINT CASE NO. 3:11-cv-02417-MEJ

1	WHEREAS, certain of the Sony Defendants have also been named as defendants in at	
2	least eighteen (18) putative class action lawsuits pending outside this District, to date;	
3	WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict	
4	Litigation (the "JPML") to centralize this and other matters, to which one response has been filed	
5	to date, and as to which other responses, including Sony Defendants' response, are due by June 2,	
6	2011.	
7	WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is July	
8	18, 2011;	
9	WHEREAS, the parties have agreed to the extension of time herein for the defendants in	
10	the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to	
11	facilitate the scheduling of this matter in coordination with the schedule for the motion before the	
12	JPML;	
13	NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,	
14	by and through their respective counsel, hereby stipulate as follows:	
15	The deadline for the defendants to respond to the Complaint in the above-captioned action	
16	is extended until and including 30 days after a consolidated complaint is filed in a multidistrict	
17	litigation centralizing the above-captioned action with other matters, or if centralization is denied	
18	by the JPML, then 30 days from the date of such order denying centralization.	
19		
20		
21		
22		
23		
24		
25		
26		
27		

28

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 23, 2011	
5	By: /s/ Stuart Gross /s/ [as authorized]	
6	Stuart Gross GROSS LAW	
7	Attorneys for Plaintiff SEAN CLAWSON	
8	SEAN CLAWSON	
9	Dated: May 23, 2011 HARVEY WOLKOFF THAD A. DAVIS	
10	ROCKY C. TSAI ROPES & GRAY LLP	
11		
12	By:/s/ Rocky C. Tsai /s/	
13	Rocky C. Tsai	
14 15	Attorneys for Defendants SONY COMPUTER ENTERTAINMENT AMERICA LLC, and SONY NETWORK	
16	ENTERTAINMÉNT INTERNATIONAL LLC	
17	[PROPOSED] ORDER	
18	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
19	na?	
20	May 25, 2011 Dated: By:	
21	U. S. Destrict Magistrate Judge	
22		
23		
24		
25		
26		
27		
28		