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12 Attorneys for Defendants

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

18 GREGORY NEWMAN III, AARON WESTER,  
 ERIC BELL, DAVID MCELROY, TONY  
 19 GREER, RAYMOND GROSCH, AMANDA  
 LIGHTAUL, and NICHOLAS MICHAEL,  
 20 individually and on behalf of all others similarly  
 situated,

21 Plaintiffs,

22 vs.

23  
 24 SONY COMPUTER ENTERTAINMENT  
 AMERICA LLC and SONY NETWORK  
 ENTERTAINMENT INTERNATIONAL LLC,  
 25

26 Defendants,

Case No. 3:11-cv-02434-JCS

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

Judge: Hon. Joseph C. Spero

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1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and  
2 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities  
3 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-five (25)  
4 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 nineteen (19) 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 parties have agreed to the extension of time herein for the defendants in  
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to  
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the  
14 JPML;

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

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

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

Dated: May 25, 2011

MICHAEL A. CADDELL  
CYNTHIA B. CHAPMAN  
CORY S. FEIN  
CADDELL & CHAPMAN

By: /s/ Cory S. Fein /s/ [as authorized]  
Cory S. Fein

Attorneys for Plaintiffs  
GREGORY NEWMAN, III *et al.*

Dated: May 25, 2011

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

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

Attorneys for Defendants  
SONY COMPUTER  
ENTERTAINMENT AMERICA LLC;  
SONY NETWORK ENTERTAINMENT  
INTERNATIONAL LLC

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 26, 2011

By:  U.S. District Judge

