

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  
 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

18 THOMAS FLAMSON and JIN CHUNG,  
 individually and on behalf of all others similarly  
 19 situated,

20 Plaintiffs,

21 v.

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

26 Defendants.  
 27  
 28

Case No. 3:11-cv-02456-JSW

**STIPULATION AND [~~PROPOSED~~]  
 ORDER TO VACATE CASE  
 MANAGEMENT CONFERENCE  
 AND ASSOCIATED DEADLINES**

Judge: Hon. Jeffrey S. White

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**STIPULATION TO VACATE CASE MANAGEMENT CONFERENCE AND ASSOCIATED DEADLINES**

1. Defendants Sony Corporation of America (SCA), Sony Online Entertainment LLC (SOE), Sony Computer Entertainment America LLC (SCEA), Sony Network Entertainment International LLC (SNEI), and Sony Network Entertainment America Inc. (SNEA), as well as certain related entities (collectively, the “Sony Defendants”), have been named as defendants in at least sixty-two (62) putative class action lawsuits, including this lawsuit, to date;

2. A motion is currently pending before the Judicial Panel on Multidistrict Litigation (the “JPML”) to centralize this and other matters before a single district court, to which multiple responses, including the Sony Defendants’ response, have been filed to date and are under submission before the JPML, with a hearing date of July 28, 2011;

3. The current date of the initial Case Management Conference (“CMC”) in this case is August 26, 2011 and certain other deadlines are set forth in the Order Setting Initial Case Management Conference and ADR Deadlines;

4. The parties agree that it is in the best interests of all parties to vacate the CMC and associated deadlines in this case in order to facilitate the scheduling of this matter in coordination with the schedule for the motion and hearing before the JPML;

NOW, THEREFORE, all parties, by and through their respective counsel, hereby stipulate for an order as follows:

In light of the motion for centralization pending before the JPML, the CMC and all associated deadlines, including those set forth in the Order Setting Initial Case Management Conference and ADR Deadlines, in the above-entitled action shall be vacated and further pretrial and scheduling matters shall be addressed by the transferee judge following centralization or, in

1 the event such motion for centralization is denied, the defendants will notify the Court within 7  
2 days after such denial, so that the Court may at that time issue a revised case schedule.

3  
4 Dated: July 27, 2011

ANDREW JOSEPH SOKOLOWSKI  
DAVID LISHIAN CHENG  
MIRIAM LEIGH SCHIMMEL  
INITIATIVE LEGAL GROUP APC

7

8 By: /s/ Andrew J. Sokolowski /s/ [as authorized]  
Andrew J. Sokolowski

9

Attorneys for Plaintiff  
THOMAS FLAMSON  
JIN CHUNG

10

11

12

Dated: July 27, 2011

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

13

14

15

16

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

17

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

18

19

20

21

22

**[PROPOSED] ORDER**

23

PURSUANT TO STIPULATION, IT IS SO ORDERED.

24

25

Dated: July 28, 2011

By:   
J. S. District Court Judge

26

27

28