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11 Attorneys for Plaintiffs Pirelli Armstrong Tire Corporation Retiree Medical Benefits Trust and
 12 City of Westland Police and Fire Retirement System

13 [Additional counsel appear on signature page.]

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

17	PIRELLI ARMSTRONG TIRE)	No. 3:11-cv-02369-SI
	CORPORATION RETIREE MEDICAL)	
18	BENEFITS TRUST, Derivatively on Behalf of)	STIPULATION AND [PROPOSED] ORDER
	WELLS & FARGO COMPANY,)	RELATING CASES [CIV. LR 3-12]
19)	
	Plaintiff,)	
20)	
	vs.)	
21)	
	JOHN G. STUMPF, et al.,)	
22)	
	Defendants,)	
23)	
	– and –)	
24)	
	WELLS FARGO & COMPANY, a Delaware)	
25	corporation,)	
)	
26	Nominal Defendant.)	
27	<hr/>		

28 [Caption continued on following page.]

1 CITY OF WESTLAND POLICE AND FIRE)
RETIREMENT SYSTEM, Derivatively on)
2 Behalf of WELLS & FARGO COMPANY,)
3)
Plaintiff,)
4 vs.)
5 JOHN G. STUMPF, et al.,)
6)
Defendants,)
7)
– and –)
8 WELLS FARGO & COMPANY, a Delaware)
corporation,)
9)
Nominal Defendant.)

No. 4:11-cv-02548-DMR

10 _____)
11 GERALD GORBERG, Derivatively on Behalf)
of WELLS & FARGO COMPANY,)
12)
Plaintiff,)
13 vs.)
14 JOHN G. STUMPF, et al.,)
15)
Defendants,)
16)
– and –)
17 WELLS FARGO & COMPANY, a Delaware)
corporation,)
18)
Nominal Defendant.)
19 _____)

No. 3:11-cv-02577-MEJ

20 [Caption continued on following page.]
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LOUISIANA MUNICIPAL POLICE)
EMPLOYEES RETIREMENT SYSTEM and)
IBEW LOCAL UNION 98, Derivatively on)
Behalf of WELLS & FARGO COMPANY,)
Plaintiffs,)
vs.)
JOHN G. STUMPF, et al.,)
Defendants,)
- and -)
WELLS FARGO & COMPANY, a Delaware)
corporation,)
Nominal Defendant.)
_____)

No. 4:11-cv-02662-DMR

1 WHEREAS, there are presently four related shareholder derivative actions on behalf of
2 nominal party Wells Fargo pending before the United States District Court for the Northern District
3 of California, San Francisco Division: (1) *Pirelli Armstrong Tire Corp. Retiree Med. Benefits Trust*
4 *v. Stumpf*, No. 3:11-cv-02369 (N.D. Cal.); (2) *City of Westland Police and Fire Ret. Sys. v. Stumpf*,
5 No. 4:11-cv-02548 (N.D. Cal.); (3) *Gerald Gorberg v. Stumpf*, No. 3:11-cv-02577 (N.D. Cal.); and
6 (4) *Louisiana Mun. Police Emps. Ret. Sys. v. Stumpf*, No. 4:11-cv-02662 (N.D. Cal.);

7 WHEREAS, the derivative actions listed above were filed on May 13, 2011, May 25, 2011,
8 May 27, 2011 and June 2, 2011, respectively, and assert claims for breach of fiduciary duty, among
9 other claims, arising from defendants' allegedly improper conduct in connection with Well Fargo's
10 foreclosure practices¹;

11 WHEREAS, the four related Wells Fargo derivative actions arise from the same questions of
12 law and fact and allege substantially the same wrongful conduct against essentially the same
13 defendants.

14 The parties, having met and conferred, hereby agree and stipulate that the four Wells Fargo
15 derivative actions listed herein should be deemed related within the meaning of Local Rule 3-12(a),
16 as set forth in plaintiffs' Administrative Motion to Consider Whether Cases Should Be Related.

17 The parties also hereby agree and stipulate that the four related Wells Fargo derivative
18 actions listed herein be assigned to the Honorable Susan Illston, United States District Judge.

19 IT IS SO STIPULATED.

20 DATED: June 20, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS

22 /s/ Shawn A. Williams
23 SHAWN A. WILLIAMS

24
25 _____
26 ¹ Defendants are the members of the Board of Directors of Wells Fargo – defendants John G.
27 Stumpf, John D. Baker, II, John S. Chen, Lloyd H. Dean, Susan E. Engel, Enrique Hernandez, Jr.,
28 Donald M. James, Richard D. McCormick, Mackey J. McDonald, Cynthia H. Milligan, Nicholas G.
Moore, Philip J. Quigley, Judith M. Runstad, Steven W. Sanger and Susan G. Swenson.

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Medical Benefits Trust and City Of Westland
Police and Fire Retirement System*

DATED: June 20, 2011

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McCormick, Mackey J. McDonald, Cynthia H.
Milligan, Nicholas G. Moore, Philip J. Quigley,
Judith M. Runstad, Steven W. Sanger and Susan
G. Swenson, and Nominal Defendant Wells
Fargo & Company*

1 I, Shawn Williams, am the ECF User whose ID and password are being used to file this
2 Stipulation and Proposed Order Relating Cases. In compliance with General Order 45, X.B., I
3 hereby attest that Timothy L. Miles, Stephen R. Basser and Sarah A. Good have concurred in this
4 filing.

5 _____
6 /s/ Shawn A. Williams
7 SHAWN A. WILLIAMS

8 PURSUANT TO STIPULATION, IT IS SO ORDERED.

9 DATED: 6/22/11

10 _____
11 
12 THE HONORABLE SUSAN ILLSTON
13 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 20, 2011.

s/ Shawn A. Williams
SHAWN A. WILLIAMS

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

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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