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 12 *(Additional Counsel listed on Signature Pages)*

13 **IN THE UNITED STATES DISTRICT COURT**
 14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

16
 17 *In re Google Inc., Android Consumer Privacy*
 18 *Litigation*

CASE No. 11 2264 JSW

MDL No. 2264

19
 20 This Document Relates to
 21 ALL CASES

STIPULATION AND ~~PROPOSED~~
ORDER RE: MODIFICATION OF
DEADLINES AS MODIFIED

22 TROY YUNCKER, individually and on behalf of
 23 all others similarly situated,

Case No. 11 3113 JSW

24 Plaintiff,

25 v.

26 PANDORA MEDIA, INC.,

27 Defendant.
 28

1 The parties in the above-entitled actions, by and through their respective attorneys,
2 hereby stipulate to the following

3 WHEREAS, on March 26, 2013, this Court granted the Motions to Dismiss filed by
4 Defendant Google Inc. and Defendant Pandora Media, Inc. with leave to amend and ordered the
5 Plaintiffs in both the *Android* and *Yuncker* actions to file Amended Complaints by April 25,
6 2013;

7 WHEREAS, Plaintiffs in the *Android* action are in the process of collecting additional
8 information from all named Plaintiffs and consulting with their retained experts to further
9 analyze data in preparation for filing their Second Amended Complaint;

10 WHEREAS, one of Plaintiffs' lead counsel in the *Android* action had an unexpected
11 family emergency requiring him to take time off from work and away from this action;

12 WHEREAS, the Parties to *Android* and *Yuncker* actions believe that these actions and the
13 Court would benefit from continuing to have the *Yuncker* action proceed in tandem with the
14 *Android* action; and

15 WHEREAS, to accommodate the additional time needed by Plaintiffs in the *Android*
16 action and the associated impact on the schedules of counsel for the other Parties, all Parties have
17 therefore agreed that the deadlines for filing Amended Complaints and the associated responsive
18 briefing should be modified in accordance with the following:

- 19 1. The Second Amended Complaint in the *Android* action shall be filed and served on or
20 before May 9, 2013;
- 21 2. Google's response to the Second Amended Complaint, including any Motion to
22 Dismiss, shall be filed and served on or before May 30, 2013;
- 23 3. If Google chooses to file a Motion to Dismiss, Plaintiffs' Opposition to Google's
24 Motion to Dismiss shall be filed on or before June 20, 2013;
- 25 4. Google's Reply to Plaintiffs' Opposition to Google's Motion to Dismiss shall be filed
26 and served on or before July 8, 2013;
- 27 5. No further amendment shall be permitted without leave of Court;

6. All corresponding deadlines in *Yuncker v Pandora Media*, 2011 CV 03113 (JSW) are vacated with new dates to be entered that track those set forth above so that the two actions can continue to progress in tandem.

IT IS SO AGREED:

DATE: April 22, 2013

/s/ Jonas P. Mann

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Interim Class Counsel

DATE: April 22, 2013

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/s/ Betsy Carol Manifold

DATE: April 22, 2013

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***Attorneys for Troy Yuncker in
Case No. 11 CV 3113 JSW***

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DATE: April 22, 2013

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Attorneys for Pandora Media, Inc. in
Case No. 11 CV 3113 JSW

1 If Defendants move to dismiss, they must notice the motion or motions to be heard on a date no earlier
2 than two weeks after the deadline for the reply, i.e. no earlier than July 26, 2013. In addition, the parties
3 must select a hearing date that is open for terminal digits 1 and 2.
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13 **PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO**
14 **ORDERED.**

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16 SIGNED this 23 day of April, 2013.

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19 JEFFREY S. WHITE
20 UNITED STATES DISTRICT JUDGE
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