

1 JORDAN ETH (BAR NO. 121617)
 Email: JEth@mofocom
 2 ANNA ERICKSON WHITE (BAR NO. 161385)
 Email: AWhite@mofocom
 3 PHILIP T. BESIROF
 Email: PBesirof@mofocom (BAR NO. 185053)
 4 MARK R.S. FOSTER
 Email: MFoster@mofocom (BAR NO. 223682)
 5 MORRISON & FOERSTER LLP
 425 Market Street
 6 San Francisco, California 94105-2482
 Telephone: 415.268.7000
 7 Facsimile: 415.268.7522

8 Attorneys for Defendants
 ZYNGA INC., MARK PINCUS, DAVID M. WEHNER, JOHN
 9 SCHAPPERT, MARK VRANESH, REGINALD D. DAVIS,
 CADIR B. LEE, WILLIAM GORDON, REID HOFFMAN,
 10 JEFFREY KATZENBERG, STANLEY J. MERESMAN,
 SUNIL PAUL, and OWEN VAN NATTA
 11

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

15 MARK H. DESTEFANO, Individually, and On
 behalf of All Others Similarly Situated,

16 Plaintiff,

17 v.

18 ZYNGA, INC., MARK PINCUS, DAVID M.
 19 WEHNER, JOHN SCHAPPERT, MARK
 VRANESH, REGINALD D. DAVIS, CADIR B.
 20 LEE, WILLIAM GORDON, REID HOFFMAN,
 JEFFREY KATZENBERG, STANLEY J.
 21 MERESMAN, SUNIL PAUL, OWEN VAN
 NATTA, MORGAN STANLEY & CO., LLC,
 22 GOLDMAN, SACHS & CO., J.P. MORGAN
 SECURITIES LLC, MERRILL LYNCH,
 23 PIERCE, FENNER & SMITH
 INCORPORATED, BARCLAYS CAPITAL
 24 INC., and ALLEN & COMPANY LLC,

25 Defendants.

26 *[Caption continues on following page.]*
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Case No. 12-cv-4007-JSW

CLASS ACTION

**STIPULATION AND ~~[PROPOSED]~~
 ORDER CONSOLIDATING
 RELATED ACTIONS AND
 DEFERRING DEFENDANTS'
 DEADLINES TO RESPOND**

Judge: Hon. Jeffrey S. White
 Complaint Filed: July 30, 2012
 Trial Date: None Set

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JOHN CAMPUS, Individually, and On Behalf Of
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA INC., MARK PINCUS, DAVID M.
WEHNER, MARK VRANESH, and JOHN C.
SCHAPPERT,

Defendants.

Case No. 12-cv-4048-JSW

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 1, 2012
Trial Date: None Set

STEVEN T. DIEMAND, Individually, and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA INC., MARK PINCUS, REGINALD D.
DAVIS, JEFF KARP, JOHN SCHAPPERT, and
DAVID M. WEHNER,

Defendants.

Case No. 12-cv-4059-JSW

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 1, 2012
Trial Date: None Set

JAKE PHILLIPS, Individually, and On Behalf Of
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4064-JSW

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 1, 2012
Trial Date: None Set

WILLIAM B. WALKER, Individually, and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4066-JSW

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 2, 2012
Trial Date: None Set

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IRA GAINES, Individually, and On Behalf Of All
Others Similarly Situated,

Plaintiff,

v.

ZYNGA INC., MARK PINCUS, DAVID M.
WEHNER, JOHN SCHAPPERT, MARK
VRANESH, REGINALD D. DAVIS, CADIR B.
LEE, WILLIAM GORDON, REID HOFFMAN,
JEFFREY KATZENBERG, STANLEY J.
MERESMAN, SUNIL PAUL, and OWEN VAN
NATTA,

Defendants.

Case No. 12-cv-4133-SBA

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 6, 2012
Trial Date: None Set

HOOMAN MOAYYED, Individually, and On
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4250-JSW

RELATED CASE

Judge: Jeffrey S. White
Complaint Filed: Aug 13, 2012
Trial Date: None Set

1 All parties, through their undersigned counsel, hereby submit this Stipulation and
2 [Proposed] Order consolidating related actions and deferring Defendants' deadlines to respond to
3 the complaints.

4 **RECITALS**

5 A. Between July 30 and August 13, 2012, the above-captioned class actions (the
6 "Related Actions") were filed in this Court. The Related Actions allege violations of the federal
7 securities laws by Zynga Inc., certain of its directors, officers, and executives, as well as
8 underwriters of Zynga's initial and secondary public offerings of stock on the NASDAQ
9 exchange market.

10 B. On August 30, 2012, the parties filed a Joint Administrative Motion to Relate
11 Actions. (Doc. 24.)

12 C. On September 17, 2012, the Court issued an order relating the actions. (Doc. 27.)

13 D. The Related Actions cases are governed by the Private Securities Litigation
14 Reform Act of 1995 (the "Reform Act").

15 E. The Reform Act requires courts to address consolidation of related actions before
16 appointing a lead plaintiff and lead counsel. *See* 15 U.S.C. §§ 77z-1(a)(3)(B), 78u-4(a)(3)(B).

17 F. Motions for appointment of lead plaintiff and lead counsel are due on
18 October 1, 2012.

19 G. The parties believe that the actions should be consolidated pursuant to Federal
20 Rule of Civil Procedure 42(a) because they involve common questions of law and fact, and
21 substantially the same parties, events, and claims under the federal securities laws.

22 H. The parties further believe that consolidation of the Related Actions would serve
23 the interests of judicial economy and avoid the potential for conflicting rulings.

24 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

25 **I. CONSOLIDATION**

26 1. The parties agree that the following actions should be consolidated for all
27 purposes, including pre-trial proceedings and trial:
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SHAWN A. WILLIAMS
DARREN J. ROBBINS
DAVID C. WALTON
ROBBINS GELLER RUDMAN & DOWD LLP

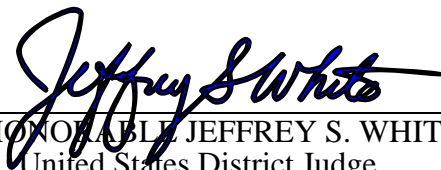
and

ALFRED G. YATES, J.R.
LAW OFFICE OF ALFRED G. YATES, J.R. P.C.

By: /s/ Shawn A. Williams
SHAWN A. WILLIAMS
Attorneys for Plaintiff Hooman Moayyed

~~PROPOSED~~ ORDER

Pursuant to stipulation, it is SO ORDERED.

By: 
THE HONORABLE JEFFREY S. WHITE
United States District Judge

Dated: September 26, 2012