

1 JORDAN ETH (CA SBN 121617)
 Email: JEth@mofo.com
 2 ANNA ERICKSON WHITE (CA SBN 161385)
 Email: AWhite@mofo.com
 3 PHILIP T. BESIROF (CA SBN 185053)
 Email: PBesirof@mofo.com
 4 MARK R.S. FOSTER (CA SBN 223682)
 Email: MFoster@mofo.com
 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
 MARK PINCUS, CADIR LEE, REID HOFFMAN, OWEN VAN
 9 NATTA, DAVID M. WEHNER, MARK VRANESH, JOHN
 SCHAPPERT, REGINALD D. DAVIS, WILLIAM GORDON,
 10 JEFFREY KATZENBERG, STANLEY J. MERESMAN, SUNIL
 11 PAUL, and JEFF KARP, and Nominal Defendant, ZYNGA INC.

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15

16 MARC ALBIN, Derivatively on Behalf of ZYNGA
 17 INC.,

18 Plaintiff,

19 -against-

20 MARK PINCUS, CADIR LEE, REID HOFFMAN,
 OWEN VAN NATTA, DAVID M. WEHNER,
 21 MARK VRANESH, JOHN SCHAPPERT,
 REGINALD D. DAVIS, WILLIAM GORDON,
 22 JEFFREY KATZENBERG, STANLEY J.
 MERESMAN, SUNIL PAUL, and JEFF KARP,

23 Defendants.

24 -and-

25 ZYNGA INC., a Delaware Corporation,
 26 Nominal Defendant.
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 28

Case No. 12-cv-4330-MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER RE-SETTING CASE
 MANAGEMENT CONFERENCE**

Judge: Hon. Maxine M. Chesney
 Case File: Aug. 16, 2012
 Trial Date: None Set

1 **RECITALS**

2 A. On August 16, 2012, plaintiff Marc Albin (“Plaintiff”) commenced this action.
3 Plaintiff seeks to bring a shareholder derivative action on behalf of Zynga Inc. against defendants
4 Mark Pincus, Cadir Lee, Reid Hoffman, Owen Van Natta, David M. Wehner, Mark Vranesh,
5 John Schappert, Reginald D. Davis, William Gordon, Jeffrey Katzenberg, Stanley J. Meresman,
6 Sunil Paul, Jeff Karp, and nominal defendant Zynga Inc. (collectively, the “Defendants”), for
7 violations of applicable state laws, breaches of fiduciary duties, waste of corporate assets, and
8 unjust enrichment.

9 B. On October 22, 2012, Plaintiff filed a Motion to Consolidate Related Class
10 Actions and Appoint Lead Counsel (Dkt. No. 5) (the “Consolidation Motion”) to consolidate the
11 following related actions (the “Related Actions”):

12 1. *IRA for the Benefit of Karl Graulich v. Pincus, et al.*, 12-cv-04327-JSW (filed
13 Aug. 16, 2012);

14 2. *Marc Albin v. Pincus, et al.*, 12-cv-04330-MMC (filed Aug. 16, 2012);

15 3. *Stacey Barron v. Pincus, et al.*, 12-cv-04547-DMR (filed Aug. 30, 2012);

16 and

17 4. *Jeanna Weber v. Pincus, et al.*, 12-cv-04684-WHA (filed Sept. 7, 2012);

18 C. On November 5, 2012, the parties filed a Joint Administrative Motion to Relate
19 Shareholder Derivative Actions to Class Actions in the matter captioned *In re Zynga Inc. Sec.*
20 *Litig.*, Lead Case No. 12-cv-04007-JSW (Dkt. No. 94) (the “Administrative Motion”). The
21 Administrative Motion, if granted, would result in the reassignment of the Related Actions,
22 including this action, to Judge Jeffrey White for all purposes.

23 D. Counsel for the parties have met and conferred regarding scheduling of a case
24 management conference (“CMC”). To conserve party and judicial resources, the parties agree
25 that it would be prudent and beneficial to defer the CMC until after the Court’s ruling on the
26 Consolidation Motion.

27 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff
28 and Defendants, through their respective counsel herein, and subject to Court approval, as

1 follows:

2 1. The CMC currently scheduled for November 16, 2012 shall be vacated pending
3 the Court's ruling on the Consolidation Motion.

4 2. Counsel for the parties shall meet and confer within fourteen days of the Court's
5 ruling on the Consolidation Motion to propose a new CMC date.

6

7 **IT IS SO STIPULATED.**

8

9 Dated: November 6, 2012

MORRISON & FOERSTER LLP

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11

By: /s/ MARK R.S. FOSTER
MARK R.S. FOSTER

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

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ROBBINS UMEDA LLP

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By: /s/ SHANE P. SANDERS

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SHANE P. SANDERS
Attorneys for Plaintiff Marc Albin

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~~PROPOSED~~ ORDER

~~Pursuant to stipulation, it is SO ORDERED.~~

The Case Management Conference currently set for November 16, 2012 is hereby CONTINUED to January 18, 2013.

By: 
THE HONORABLE MAXINE M. CHESNEY
United States District Judge

Dated: November 7, 2012

ECF ATTESTATION

I, Mark R.S. Foster, am the ECF User whose ID and Password are being used to file this:

**STIPULATION AND [PROPOSED] ORDER RE-SETTING
CASE MANAGEMENT CONFERENCE**

In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Shane Sanders has concurred in this filing.

Dated: November 6, 2012

MORRISON & FOERSTER LLP

By: /s/ MARK R.S. FOSTER