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7 *Proposed Co-Lead Counsel and Counsel for*
 8 *Plaintiffs Ian Cassiman and Clair Vanderschaaf*

9 [Additional Counsel on Signature Page]

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13	IAN CASSIMAN, Derivatively on Behalf)	Case No.: C-12-05556-RS
14	of OCZ TECHNOLOGY GROUP, INC.,)	
)	
	Plaintiff,)	STIPULATION CONSOLIDATING
15	v.)	ACTIONS AND RELATED MATTERS
)	AND [PROPOSED] ORDER THEREON
16	RYAN M. PETERSEN, ARTHUR F.)	
17	KNAPP, JR., RALPH H. SCHMITT,)	
18	ADAM J. EPSTEIN, RICHARD L.)	
	HUNTER, and RUSSELL J. KNITTEL,)	
)	
	Defendants,)	
19	-and-)	
)	
20	OCZ TECHNOLOGY GROUP, INC., a)	
	Delaware corporation,)	
21)	Judge: Hon. Richard Seeborg
	Nominal Defendant.)	
22	_____)	

23 [Caption Continued on the Next Page]

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1 WHEREAS, there are presently three related shareholder derivative actions against
2 certain of the officers and directors of OCZ Technology Group, Inc. ("OCZ") on file in this
3 Court;

4 WHEREAS, in an effort to assure consistent rulings and decisions and the avoidance of
5 unnecessary duplication of effort, counsel for plaintiffs as well as counsel for defendants in the
6 related OCZ shareholder derivative actions currently on file in this Court enter into this
7 stipulation. The counsel are: (1) Robbins Arroyo LLP on behalf of plaintiffs Ian Cassiman and
8 Clair Vanderschaaf; (2) Robbins Geller Rudman & Dowd LLP on behalf of plaintiff Robert L.
9 Morton; (3) and Wilson Sonsini Goodrich & Rosati on behalf of defendants Arthur F. Knapp, Jr.,
10 Ralph H. Schmitt, Adam J. Epstein, Richard L. Hunter, Russell J. Knittel, and nominal defendant
11 OCZ;

12 WHEREAS, the parties have met and conferred and agree that the actions should be
13 consolidated under Rule 42(a) of the Federal Rules of Civil Procedure and that consolidation of
14 the actions will promote judicial economy and preserve both public and private resources; and

15 WHEREAS, plaintiffs and defendants agree that it would be duplicative and wasteful of
16 the Court's resources for defendants named in plaintiffs' shareholder derivative actions to have to
17 respond to the individual complaints prior to the agreed upon consolidation;

18 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by plaintiffs and
19 defendants, through their respective counsel of record, as follows:

20 1. The following actions are hereby related and consolidated for all purposes,
21 including pre-trial proceedings and trial:

<u>Case Name</u>	<u>Case Number</u>	<u>Date Filed</u>
<i>Cassiman v. Petersen, et al.</i>	No. C-12-05556-RS	October 29, 2012
<i>Vanderschaaf v. Petersen, et al.</i>	No. C-12-06058-RS	November 29, 2012
<i>Morton v. Schmitt, et al.</i>	No. C-12-06343-RS	December 14, 2012

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6 and

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13 7. Plaintiffs' Co-Lead Counsel shall have sole authority to speak for plaintiffs in
14 matters regarding pre-trial procedure, trial, and settlement and shall make all work assignments
15 in such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid
16 duplicative or unproductive effort.

17 8. Plaintiffs' Co-Lead Counsel shall be responsible for coordinating all activities and
18 appearances on behalf of plaintiffs. No motion, request for discovery, or other pre-trial or trial
19 proceedings shall be initiated or filed by any plaintiff except through plaintiffs' Co-Lead
20 Counsel.

21 9. Plaintiffs' Co-Lead Counsel shall be available and responsible for
22 communications to and from this Court, including distributing orders and other directions from
23 the Court to counsel. Plaintiffs' Co-Lead Counsel shall be responsible for creating and
24 maintaining a master service list of all parties and their respective counsel.

25 10. Defendants' counsel may rely upon all agreements made with plaintiffs' Co-Lead
26 Counsel, or other duly authorized representative of plaintiffs' Co-Lead Counsel, and such
27 agreements shall be binding on all plaintiffs.

28 11. Defendants' counsel signing this stipulation shall appear for and accept service on
behalf of all their clients who have not already been served.

12. Defendants take no position as to the appointment of Co-Lead Counsel.

1 Dated: January 8, 2013

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20 *Counsel for Plaintiff Robert L. Morton*

21 Dated: January 8, 2013

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Ralph H. Schmitt, Adam J. Epstein, Richard L.
Hunter, Russell J. Knittel, and nominal defendant
OCZ Technology Group, Inc.*

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I, George C. Aguilar, am the ECF User whose ID and password are being used to file this Stipulation Consolidating Related Actions, Appointing Co-Lead Counsel and Related Matters and [Proposed] Order Thereon. In compliance with General Order No. 45, X.B., I hereby attest that Diane Walters and Travis E. Downs, III have concurred in this filing.

s/ George C. Aguilar
GEORGE C. AGUILAR

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1/14/13
DATED


HONORABLE RICHARD DEBORG
UNITED STATES DISTRICT JUDGE

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