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

13 ANIKA R. RIECKBORN, Individually and on)
Behalf of All Others Similarly Situated,)

14 Plaintiff,)

15 v.)

16 VELTI PLC, ALEX MOUKAS, WILSON W.)
CHEUNG, and JEFFREY G. ROSS,)

17 Defendants.)
18)
19)
20)

CASE NO.: 3:13-cv-03889-WHO

**STIPULATION AND ORDER TO
CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE
AND RELATED DEADLINES**

This Document Relates to:
Case No.: 3:13-cv-03889-WHO,
Rieckborn v. Velti plc, et al.

21 CHRIS VAFINIS, Individually and on Behalf of)
All Other Persons Similarly Situated,)

22 Plaintiff,)
23)

24 v.)

25 VELTI PLC, ALEX MOUKAS, WILSON W.)
CHEUNG, and JEFFREY G. ROSS,)

26 Defendants.)
27)
28)

CASE NO.: 4:13-cv-03954-YGR

STIPULATION AND ORDER
TO CONTINUE INITIAL CMC,
Case No. 3:13-cv-3889-WHO

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HAN LEE, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, and JEFFREY G. ROSS,

Defendants.

CASE NO.: 3:13-cv-04140-SI

RAYMUND MANABAT, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VELTI PLC, ALEX MOUKAS, WILSON W.
CHEUNG, JEFFREY G. ROSS, WINNIE W.
TSO, CHRIS KASKAVELIS, DAVID W.
MANN, DAVID C. HOBLEY, JERRY
GOLDSTEIN, NICHOLAS P. NEGROPONTE,
JEFFERIES & COMPANY, INC., RBC
CAPITAL MARKETS, LLC, NEEDHAM &
COMPANY, LLC, CANACCORD GENUITY
INC., and THINKEQUITY LLC,

Defendants.

CASE NO.: 3:13-cv-04606-JSC

1 WHEREAS, on August 22, 2013, plaintiff Anika R. Rieckborn (“Plaintiff”) filed a “Class
2 Action Complaint for Violations of the Federal Securities Laws,” and the above-captioned
3 *Rieckborn* Action was assigned to this Court;

4 WHEREAS, on August 26, 2013, plaintiff Chris Vafinis filed a “Class Action Complaint
5 for Violations of the Federal Securities Laws,” and the above-captioned *Vafinis* Action was
6 assigned to Judge Yvonne Gonzalez Rogers;

7 WHEREAS, on September 6, 2013, plaintiff Han Lee filed a “Class Action Complaint for
8 Violations of the Federal Securities Laws,” and the above-captioned *Lee* Action was assigned to
9 Judge Susan Illston;

10 WHEREAS, on October 4, 2013, plaintiff Raymund Manabat filed a “Class Action
11 Complaint for Violations of the Federal Securities Laws,” and the above-captioned *Manabat*
12 Action was assigned to Magistrate Judge Jacqueline Scott Corley;

13 WHEREAS, on October 21, 2013, various movants filed motions to consolidate the
14 above-captioned *Rieckborn*, *Vafinis*, *Lee*, and *Manabat* Actions, to appoint a Lead Plaintiff
15 pursuant to the requirements of the Private Securities Litigation Reform Act of 1995 (the
16 “Reform Act”), and to approve the selection of Lead Counsel (the “Consolidation Motions”);

17 WHEREAS, a hearing on the Consolidation Motions is scheduled before the Court on
18 November 27, 2013;

19 WHEREAS, an Initial Case Management Conference in the above-captioned *Rieckborn*
20 Action is scheduled for November 26, 2013 at 2:00 p.m., and a Joint Case Management
21 Statement is due to be filed by November 19, 2013;

22 WHEREAS, in light of the pending Consolidation Motions and the requirements of the
23 Reform Act, and to avoid unnecessary expenditure of judicial resources or effort by the parties
24 and the Court, counsel for Plaintiff and Defendant Velti have agreed, subject to approval of the
25 Court, that: (1) the November 26, 2013 Initial Case Management Conference (“CMC”) and
26 related CMC and ADR deadlines in the *Rieckborn* Action shall be adjourned pending a
27 determination on consolidation and the appointment of a Lead Plaintiff; and (2) Defendant need

1 not respond to the individual complaint in the *Rieckborn* Action, other than a consolidated
2 complaint or a complaint designated as the operative complaint after the appointment of a Lead
3 Plaintiff; and

4 WHEREAS, the requested continuances are not for the purpose of delay and will not
5 prejudice any party.

6 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
7 undersigned, subject to approval of the Court:

8 1. The November 26, 2013 Initial Case Management Conference and related CMC
9 and ADR deadlines in the *Rieckborn* Action are hereby adjourned, pending a determination on
10 consolidation and the appointment of a Lead Plaintiff, to such other date and time as this Court
11 shall order.

12 2. Defendant is not required to respond to the individual complaint in the *Rieckborn*
13 Action, other than a consolidated complaint or a complaint designated as the operative complaint
14 after the appointment of a Lead Plaintiff.

15 Dated: November 13, 2013

Respectfully submitted,

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21 By: /s/ Diane M. Walters
Diane M. Walters

22 *Attorneys for Defendant Velti plc*

1 Dated: November 13, 2013

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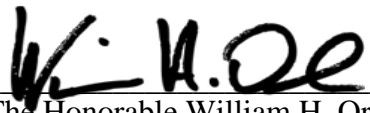
ORDER

Upon stipulation of the parties, and good cause appearing:

IT IS SO ORDERED. **The new setting for the Case Management Conference shall be**

January 7, 2014 at 2:00 p.m.

Dated: November 14, 2013



The Honorable William H. Orrick
United States District Judge

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