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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 RYAN KELLY, Individually and On Behalf
of All Others Similarly Situated,
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Plaintiff,
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v.
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ELECTRONIC ARTS, INC., ANDREW
15 WILSON, BLAKE JORGENSEN, PATRICK
SÖDERLUND, FRANK D. GIBEAU AND
16 PETER ROBERT MOORE,
17
Defendants.

Case No. 3:13-cv-05837-SI

18 LOUIS MASTRO, Individually and On
Behalf of All Others Similarly Situated,
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Plaintiff,
20
v.
21
ELECTRONIC ARTS, INC., ANDREW
22 WILSON, BLAKE JORGENSEN, PATRICK
SÖDERLUND, FRANK D. GIBEAU AND
23 PETER ROBERT MOORE,
24
Defendants.

Case No. 3:14-cv-00188-SI

**STIPULATION AND ~~PROPOSED~~
ORDER RELATING AND
CONSOLIDATING CASES**
C-14-0188 IS ADMINISTRATIVELY CLOSED

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 1. Pursuant to Fed. R. Civ. P. 42(a), and Civil L.R. 3-12 plaintiffs Ryan Kelly and
3 Louis Mastro (collectively, “Plaintiffs”), and defendants Electronic Arts, Inc., Andrew Wilson,
4 Blake Jorgensen, Patrick Söderlund, Frank D. Gibeau and Peter Robert Moore (collectively,
5 “Defendants”), hereby give notice that two putative class action complaints asserting violations of
6 federal securities laws have been filed to date by shareholders of Electronic Arts, Inc. (“EA”) in
7 the Northern District of California.

8 2. On November December 17, 2013, the first of at least two related actions were
9 filed, and notice of this action to members of the purported class was published pursuant to 15
10 U.S.C. §78u-4(a)(3)(A) (“Notice”). The Notice provided that “no later than 60 days” from the
11 date of the Notice, any member of the purported class “may move the Court to serve as lead
12 plaintiff through counsel of their choice”

13 3. Pursuant to the Notice as well as 15 U.S.C. §78u-4(a)(3)(B), on or before February
14 18, 2014, the parties expect one or more members of the purported class to file with the Court a
15 motion for appointment of lead plaintiff(s) and lead counsel.

16 4. These two actions concern the same parties, arise out of the same transactions or
17 occurrences, and involve substantially similar alleged issues of fact and law.

18 5. In an effort to ensure consistent rulings and to avoid unduly burdensome
19 duplication of labor and expense, counsel for the parties in the above-captioned actions enter into
20 the instant Stipulation in order to relate and consolidate the two actions for all purposes, including
21 pre-trial proceedings and trial.

22 6. The two actions are as follows:

23

Case Name	Case Number	Date Filed
<i>Ryan Kelly v. Electronic Arts, Inc., et al.</i>	13-cv-05837-SI	December 17, 2013
<i>Louis Mastro v. Electronic Arts, Inc., et al.</i>	14-cv-00188-SI	January 13, 2014

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7. The parties agree that it would be duplicative and wasteful of the parties' and the Court's resources for Defendants to respond to the individual complaints prior to consolidation and the filing of a consolidated complaint ("Consolidated Complaint").

Thus, **IT IS HEREBY STIPULATED** by the parties, through their counsel of record, that:

1. Defendants hereby accept service of the above-captioned complaints.
2. The above-captioned cases should be consolidated into one Consolidated Action bearing the case number Civil Action No. 13-cv-05837-SI pending before the Honorable Susan Illston.
3. The other above-referenced action, *Louis Mastro v. Electronic Arts, Inc., et al.*, Civil Action No. 14-cv-00188-SI (the "Mastro Action"), should be closed for administrative purposes. The Clerk of the Court shall file a copy of this order in the separate file for the Mastro Action.
4. The docket in Civil Action No. 13-cv-05837-SI shall constitute the Master Docket for this action. Every pleading filed in the Consolidated Action shall bear the following caption:

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re ELECTRONIC ARTS, INC. SECURITIES LITIGATION)	Master File No.
)	4:13-cv-05837-SI
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)	CLASS ACTION
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This Document Relates To:)	
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5. The file in Civil Action No. 13-cv-05837-SI shall constitute a Master File for every action in the Consolidated Action. When the document being filed pertains to all actions, the phrase “All Actions” shall appear immediately after the phrase “This Documents Relates To.” When a document applies only to some, not all, of the actions, the document shall list, immediately after the phrase “This Documents Relates To:,” the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action.
6. All related actions subsequently filed in, or transferred to, this District shall be consolidated into the Master Docket. This Order shall apply to every such action, absent order of the Court.
7. Subsequent to the Court’s selection of lead plaintiff and lead plaintiff’s counsel, unless otherwise agreed upon by the parties, a Consolidated Complaint shall be filed by lead plaintiff’s counsel within 45 days of the entry of the order designating lead plaintiff and lead plaintiff’s counsel.
8. No Defendant shall be required to answer, move, or otherwise respond to the various initial complaints filed in any of the actions identified above or any subsequently-filed related action. Defendants shall answer, move or otherwise respond to the Consolidated Complaint within 45 days after the date on which all Defendants have been served with the Consolidated Complaint.
9. If any Defendant files a motion to dismiss the Consolidated Complaint, a motion to strike, or any other motion in response to the Consolidated Complaint, lead plaintiff shall have 45 days to file an opposition thereto, and Defendants shall file their reply papers within 30 days thereafter, unless otherwise agreed upon by the parties subject to Court approval. The parties shall meet and confer on a date for the hearing of any such motion and the parties shall schedule the hearing date at a time that is convenient to the Court.

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10. Lead plaintiff's counsel shall have authority to speak for, and enter into agreements on behalf of Plaintiffs in all matters regarding pretrial procedures, discovery, and settlement negotiations. Defendants' counsel may rely upon agreements made with lead plaintiff's counsel and such agreements shall be binding on all Plaintiffs.

Dated: January 21, 2014

ROBERT P. VARIAN
JAMES N. KRAMER
ALEXANDER K. TALARIDES
Orrick, Herrington & Sutcliffe LLP

/s/ Robert P. Varian

ROBERT P. VARIAN
Attorneys for Defendants

I, Robert P. Varian, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Relating and Consolidating Cases. In compliance with General Order 45, X.B., I hereby attest that Jeremy A. Lieberman has concurred in this filing.

Dated: January 21, 2014

JEREMY A. LIEBERMAN
LESLEY F. PORTNOY
Pomerantz LLP

/s/ Jeremy A. Lieberman

JEREMY A. LIEBERMAN
Attorneys for Plaintiff Louis Mastro

II, Robert P. Varian, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Relating and Consolidating Cases. In compliance with General Order 45, X.B., I hereby attest that Shawn Williams has concurred in this filing.

Dated: January 21, 2014

SHAWN WILLIAMS
SAMUEL RUDMAN
MARY BLASY
Robbins Geller Rudman & Dowd

/s/ Shawn Williams

SHAWN WILLIAMS
Attorneys for Plaintiff Ryan Kelly

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ORDER

Based on the stipulation of the signed parties, and good cause appearing, IT IS HEREBY ORDERED that the Stipulation is approved.

It is so ORDERED.

DATED: 1/22/14 _____



THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

The Court hereby administratively closes C-14-0188 SI. All filings shall be made in the master case C-13-5837 SI.