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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KEITH THOMAS, RICHARD HAYES, HERB
SMITH, and OKLAHOMA POLICE PENSION &
RETIREMENT SYSTEM,

Plaintiffs,

v.

MAGNACHIP SEMICONDUCTOR CORP. SANG
PARK, TAE YOUNG HWANG, MARGARET
SAKAI, R. DOUGLAS NORBY, ILBOK LEE,
NADER TAVAKOLI, RANDAL KLEIN,
MICHAEL ELKINS, AVENUE CAPITAL
MANAGEMENT II, L.P., BARCLAYS CAPITAL
INC., DEUTSCHE BANK SECURITIES INC.,
CITIGROUP GLOBAL MARKETS INC., UBS
SECURITIES LLC and NEEDHAM & COMPANY,
LLC,

Defendants.

CASE NO.: 3:14-cv-01160-JST

STIPULATION AND ~~PROPOSED~~
ORDER AMENDING PLAINTIFFS'
PAGE LIMIT FOR THEIR
OPPOSITIONS TO DEFENDANTS'
MOTIONS TO DISMISS THE THIRD
AMENDED COMPLAINT

STIPULATION AND ~~PROPOSED~~ ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS THE THIRD AMENDED COMPLAINT

1 WHEREAS, pursuant to the Court's May 7, 2015 Order Granting Defendants'
2 Motion for Order Enlarging Time (the "May 7 Order") and the Court's June 15, 2015 Order Re
3 Motion to Coordinate and Partially Consolidate a Related Action, Lead Plaintiff Keith Thomas
4 and plaintiffs Richard Hayes, Herb Smith, and Oklahoma Police Pension & Retirement System
5 ("Plaintiffs") filed the Third Amended Complaint for Violations of the Federal Securities Laws
6 on June 26, 2015;

7 WHEREAS, pursuant to the May 7 Order, Defendants filed the following four
8 motions to dismiss on July 27, 2015:

- 9 • Defendants MagnaChip Semiconductor Corp., R. Douglas Norby, and
10 Ilbok Lee's Motion to Dismiss Plaintiffs' Third Amended Complaint and
11 Memorandum of Points and Authorities in Support Thereof;
- 12 • Defendants Michael Elkins, Randal Klein, and Avenue Capital
13 Management II. L.P.'s Motion to Dismiss Plaintiffs' Third Amended
14 Complaint and Memorandum of Points and Authorities in Support
15 Thereof;
- 16 • Defendant Nader Tavakoli's Motion to Dismiss Plaintiffs' Third Amended
17 Complaint and Memorandum of Points and Authorities in Support
18 Thereof; and
- 19 • Underwriter Defendants' Motion to Dismiss the Third Amended
20 Complaint and Memorandum of Points and Authorities in Support Thereof

21 WHEREAS, pursuant to the Court's May 7 Order, Plaintiffs' opposition briefs
22 must be filed by September 25, 2015;

23 WHEREAS, pursuant to Local Civil Rule 7-3(a), Plaintiffs are permitted to file an
24 opposition brief of 25 pages to each of Defendants' four motions for a total of 100 pages;

25 NOW, THEREFORE, it is hereby stipulated and agreed by the undersigned
26 counsel as follows:

1 1. In lieu of filing four opposition briefs, Plaintiffs may file two briefs not to exceed
2 a total of seventy (70) pages.

3
4 Dated: September 21, 2015

5 **POMERANTZ LLP**

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1 I, Michael J. Wernke, am the ECF User whose ID and password are being used to file this
2 STIPULATION AND [PROPOSED] ORDER AMENDING *PLAINTIFFS' PAGE LIMIT FOR*
3 *THEIR OPPOSITIONS TO DEFENDANTS' MOTIONS TO DISMISS*. In compliance with Civil
4 L.R. 5-1(i)(3), I hereby attest that the signatories below have concurred in this filing.

5
6 DATED: September 21, 2015

7 **POMERANTZ LLP**

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STIPULATION AND [PROPOSED] ORDER AMENDING PLAINTIFFS' PAGE LIMIT FOR THEIR OPPOSITION TO
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IT IS SO ORDERED.

Dated: September 21, 2015



Honorable Jon S. Tigar
United States District Judge