

1 **AKIN GUMP STRAUSS HAUER & FELD LLP**
 2 PETER I. ALTMAN (SBN 285292)
 3 2029 Century Park East, Suite 2400
 4 Los Angeles, CA 90067-3010
 Telephone: (310) 782-3085
 Facsimile: (310) 229-1001
 Email: paltman@akingump.com

5 Attorneys for Michael Elkins

6 [Additional Counsel on Signature Page]

7
 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

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

12 Plaintiffs,

13 v.

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

20 Defendants.

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

**STIPULATION REGARDING
 PROTECTIVE ORDER ON
 CONFIDENTIALITY**

21
 22 **WHEREAS**, on February 8, 2016, this Court entered a Stipulated Protective
 23 Order on Confidentiality ("Protective Order"), ECF No. 187, to which Lead Plaintiff and
 24 MagnaChip Semiconductor Corp. ("MagnaChip") were signatories;

25 **WHEREAS**, Michael Elkins ("Elkins") was not a signatory to the Protective
 26 Order;

27 **WHEREAS**, Lead Plaintiff and Elkins agree that the terms of the Protective
 28 Order should apply to all discovery in this matter between Lead Plaintiff and Elkins;

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS THEREFORE STIPULATED THAT:

All discovery in this matter between Lead Plaintiff and Elkins shall be governed by, and conducted pursuant to, the terms of the Protective Order.

Dated: October 11, 2016

POMERANTZ LLP

AKIN GUMP STRAUSS HAUER & FELD
LLP

/s/ Joshua B. Silverman
Patrick V. Dahlstrom
Joshua B. Silverman
10 South LaSalle Street, Suite 3505
Chicago, IL 60603
Telephone: (312) 377-1181
Facsimile: (312) 377-1184
pdahlstrom@pomlaw.com
jbsilverman@pomlaw.com

/s/ John C. Murphy
John C. Murphy
Sydney Spector
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
Fax: (212) 872-1002
jmurphy@akingump.com
sspector@akingump.com

-and-

-and-

Marc I. Gross
Jeremy A. Lieberman
Michael J. Wernke
600 Third Avenue, 20th Floor
New York, NY 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
migross@pomlaw.com
jalieberman@pomlaw.com
mjwernke@pomlaw.com

Neal R. Marder
Peter I. Altman
2029 Century Park East, Suite 2400
Los Angeles, CA 90067-3010
Telephone: (310) 782-3085
Facsimile: (310) 229-1001
nmarder@akingump.com
paltman@akingump.com

Attorneys for Michael Elkins

Lead Counsel for the Class

