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19 *Class Counsel*

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

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

25 Plaintiffs,

26 v.

27 MAGNACHIP SEMICONDUCTOR CORP.
 28 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

CLASS ACTION

Judge: Hon. Jon S. Tigar

**STIPULATION AND PROPOSED
 ORDER PURSUANT TO LOCAL RULE
 6-2**

1 All parties, through their undersigned counsel, hereby submit this Stipulation and Proposed
2 Order regarding expert disclosure deadlines:

3 WHEREAS, the scheduling order entered by this Court on April 13, 2016 (ECF No. 223)
4 provides that expert disclosures shall be made on or before February 3, 2017, expert rebuttal reports
5 shall be served on or before March 17, 2017, and expert reply reports shall be served on or before
6 April 14, 2017;

7 WHEREAS, consistent with this order, Plaintiffs and Defendant Avenue Capital
8 Management II, L.P. exchanged their opening expert reports on February 3, 2017;

9 WHEREAS, the parties hereto and settling defendants have been attempting to schedule
10 depositions in Korea, and have been told that at least four deponents can be produced in Korea
11 during the week of March 6, 2017, and that certain of these deponents and their counsel have
12 conflicts that will make scheduling of alternative dates difficult;

13 WHEREAS, the parties desire to take advantage of the ability to depose numerous witnesses
14 in a single week in Korea, to minimize cost and travel time;

15 WHEREAS, adjusting the deadline for expert rebuttal reports, currently due on March 17,
16 2017, will facilitate the parties' ability to conduct depositions in Korea during the week of March 6;

17 WHEREAS, the parties have not previously requested any extension to any expert deadline;
18 and

19 WHEREAS, the parties do not anticipate that the extension requested herein will require
20 extending any dates other than those listed below. Neither party, however, waives the right to
21 petition the Court to extend any other deadline if circumstances warrant; and

22 WHEREAS, the undersigned parties believe that the circumstances described above warrant
23 good cause to make the minor enlargement to expert deadlines requested herein.

24 NOW, THEREFORE, the undersigned hereby stipulate, subject to Court approval, that:

- 25 1. The deadline for serving expert rebuttal reports is extended from March 17, 2017 to
26 April 14, 2017.
- 27 2. The deadline for serving expert reply reports is extended from April 14, 2017 to May 12,
28 2017.

Dated: February 13, 2017

1 **IT IS SO STIPULATED:**

2 **AKIN GUMP STRAUSS HAUER**
3 **& FELD LLP**

4 /s/ John C. Murphy

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 13, 2017



Hon. Jon S. Tigar,
United States Dist. Judge