

1 COOLEY LLP  
 JOHN C. DWYER (136533) (dwyerjc@cooley.com)  
 2 BRETT DE JARNETTE (292919) (bdejarnette@cooley.com)  
 3175 Hanover Street  
 3 Palo Alto, CA 94304  
 Telephone: (650) 843-5000  
 4 Facsimile: (650) 849-7400

5 COOLEY LLP  
 RYAN E. BLAIR (246724) (rblair@cooley.com)  
 6 4401 Eastgate Mall  
 San Diego, CA 92121  
 7 Telephone: (858) 550-6000  
 8 Facsimile: (858) 550-6420

Attorneys for Defendants  
 9 Geron Corporation, John A. Scarlett, Olivia K. Bloom, and Stephen M. Kelsey

10 *[Additional counsel listed on signature page]*

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

13  
 14 In re: GERON CORPORATION SECURITIES  
 15 LITIGATION

CA No. 3:14-CV-01224 (CRB)

**STIPULATION AND ORDER TO  
 MODIFY CASE MANAGEMENT  
 SCHEDULE**

16 This Document Relates To:

Judge: Hon. Charles R. Breyer  
 Courtroom: 6, 17th Floor

17 **ALL ACTIONS**

**CONSOLIDATED CLASS ACTION**

1           Lead Plaintiff Vinod Patel (“Lead Plaintiff”) and Defendants Geron Corporation, John A.  
2 Scarlett, Olivia K. Bloom, and Stephen M. Kelsey (collectively “Defendants” and together with  
3 Lead Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

4           WHEREAS, on November 6, 2015, the Parties filed their Joint Case Management Statement  
5 and Order (the “Initial CMS”) (ECF No. 94) proposing a litigation schedule and discovery plan for  
6 this action;

7           WHEREAS, on November 13, 2015, the Court expressly adopted certain dates set forth in  
8 the Initial CMS, and, although not reflected in the Minute Entry (ECF No. 95), presumably  
9 approved the remaining dates set forth in the Initial CMS;

10           WHEREAS, on June 9, 2016, the Court entered an order modifying certain dates set forth in  
11 the Initial CMS (ECF No. 101) (the “Modified Scheduling Order”);

12           WHEREAS, the Parties engaged in informal, targeted discovery and attempted to resolve  
13 the dispute amicably, but have been unable to do so to date;

14           WHEREAS, on July 8, 2016, Lead Plaintiff served discovery on Defendants, including  
15 requests for the production of documents;

16           WHEREAS, Defendants intend to serve discovery on Lead Plaintiff, including requests for  
17 the production of documents;

18           WHEREAS, the Parties have met and conferred and agreed to a new case management  
19 schedule that would extend the time for the Parties to substantially complete their respective  
20 document productions by approximately one month; and

21           WHEREAS, this one month extension for the Parties to substantially complete their  
22 respective document productions would not alter any other dates set forth in the Modified  
23 Scheduling Order;

24           WHEREFORE, IT IS HEREBY STIPULATED AND AGREED that,

25           1.       The following amended case management schedule should be adopted and the dates  
26 highlighted in the chart below should replace the dates set forth in the Modified Scheduling Order:

<b>EVENT</b>	<b>DATE</b>
Exchange of initial disclosures	December 11, 2015
Plaintiff to file class certification motion	August 12, 2016
Deadline for substantial completion of document productions	<b><i>October 31, 2016</i></b>
Defendants to respond to Plaintiff's class certification motion	September 26, 2016
Plaintiff's reply in support of class certification motion	November 7, 2016
Hearing on Plaintiff's class certification motion	December 2, 2016, or on a date set by the Court
Fact discovery cut-off	February 24, 2017
Last day to amend pleadings or add parties	March 10, 2017
Deadline for Plaintiff to submit expert reports	April 7, 2017
Deadline for Defendants to submit expert reports	May 8, 2017
Deadline for Plaintiff to submit rebuttal expert reports, if any	June 7, 2017
Expert discovery cut-off	June 23, 2017
Defendants to file motion for summary judgment and/or summary adjudication	July 14, 2017
Plaintiff's to respond to Defendants' motion for summary judgment and/or summary adjudication	August 28, 2017
Defendants reply in support of Defendants' motion for summary judgment and/or summary adjudication	October 12, 2017
Last day to conduct settlement conference	No later than 25 days after Court's ruling on all dispositive motions
Deadline to serve and file Rule 26(a)(3) disclosures	No later than 30 days after Court's ruling on all dispositive motions
Deadline to serve motions <i>in limine</i>	No later than 30 days after Court's ruling on all dispositive motions
Deadline to serve oppositions to motions <i>in limine</i>	No later than 60 days after Court's ruling on all dispositive motions

1	Deadline for the Parties to exchange copies of all exhibits, summaries, charts, and diagrams to be used at trial other than solely for impeachment	No later than 60 days after Court's ruling on all dispositive motions
3	Deadline to file joint proposed final pretrial order and other materials as set forth in the Court's "Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases"	No later than 73 days after Court's ruling on all dispositive motions
6	Pre-trial conference	No later than 80 days after Court's ruling on all dispositive motions
8	Trial to commence	No later than 90 days after Court's ruling on all dispositive motions

10 Dated: July 28, 2016

**COOLEY LLP**

11 By: /s/ Ryan E. Blair  
 12 John C. Dwyer (136533)  
 13 Brett De Jarnette (292919)  
 14 3175 Hanover Street  
 15 Palo Alto, CA 94304  
 16 Telephone: (650) 843-5000  
 17 Facsimile: (650) 849-7400  
 18 Email: jdwyer@cooley.com

19 Ryan E. Blair (246724)  
 20 4401 Eastgate Mall  
 21 San Diego, CA 92121-1909  
 22 Telephone: (858) 550-6000  
 23 Facsimile: (858) 550-6420  
 24 Email: rblair@cooley.com

*Attorneys for Defendants Geron Corporation,  
 John A. Scarlett, Olivia K. Bloom,  
 and Stephen M. Kelsey*

22 Dated: July 28, 2016

**FARUQI & FARUQI, LLP**

23 By: /s/Richard W. Gonnello  
 24 Richard W. Gonnello

25 Richard W. Gonnello (admitted *pro hac vice*)  
 26 Megan M. Sullivan (admitted *pro hac vice*)  
 27 Katherine M. Lenahan (admitted *pro hac vice*)  
 28 685 Third Avenue, 26th Floor  
 New York, NY 10017  
 Telephone: 212-983-9330  
 Facsimile: 212-983-9331  
 Email: rgonnello@faruqilaw.com  
 msullivan@faruqilaw.com

klenahan@faruqilaw.com

Barbara Rohr SBN 273353  
10866 Wilshire Boulevard, Suite 1470  
Los Angeles, CA 90024  
Telephone: 424-256-2884  
Facsimile: 424-256-2885  
Email: brohr@faruqilaw.com

*Attorneys for Lead Plaintiff*

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**ATTESTATION (CIVIL LOCAL RULE 5-1(i)(3))**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatory.

Dated: July 28, 2016

**FARUQI & FARUQI, LLP**

*/s/ Ryan E. Blair*  
\_\_\_\_\_  
Ryan E. Blair (246724)


*Attorneys for Defendants*

\* \* \*

**ORDER**

Pursuant to the foregoing stipulation, and good cause appearing, **IT IS SO ORDERED.**

DATED: July 29, 2016

  
\_\_\_\_\_  
Honorable Charles R. Breyer  
United States District Judge