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7 Lead Counsel for Lead Plaintiff

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9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 JOSEPH CURRY, Individually and on Behalf)
 of All Others Similarly Situated,)

12 Plaintiff,)

13 vs.)

14 YELP INC., et al.,)

15 Defendants.)

Case No. 3:14-cv-03547-JST
(Consolidated)

CLASS ACTION

16) STIPULATION AND ~~(PROPOSED)~~ ORDER
) ESTABLISHING SCHEDULE FOR
) PLAINTIFFS TO FILE A CONSOLIDATED
) AMENDED COMPLAINT AND FOR
) BRIEFING ON DEFENDANTS'
) ANTICIPATED MOTION TO DISMISS

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1 WHEREAS on August 6, 2014, plaintiff Joseph Curry filed a putative class action complaint,
2 Curry v. Yelp Inc. et al., No. 3:14-cv-03547-JST (“Complaint”) (Dkt. No. 1) against defendants Yelp
3 Inc., Jeremy Stoppelman, Robert J. Krolik and Geoffrey Donaker (collectively, “defendants”), for
4 violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934;

5 WHEREAS, on August 25, 2014, plaintiff Mary Adams filed a similar putative class action
6 complaint in a separate action, Adams v. Yelp Inc. et al., No. 3:14-cv-03832-EMC (the “Adams
7 Complaint”) against defendants, asserting the same or substantially similar violations of Sections
8 10(b) and 20(a) of the Securities Exchange Act of 1934;

9 WHEREAS, on August 29, 2014, the parties entered into a stipulation and agreement to
10 continue the initial case management conference, reset related deadlines and extend defendants time
11 to respond to the Complaint (Dkt. No. 8);

12 WHEREAS, on November 17, 2014, the Court entered an Order (1) Consolidating Cases (2)
13 Appointing Lead Plaintiff (3) Appointing Lead Counsel (Dkt. No. 30), which consolidated the two
14 above-referenced complaints, appointed City of Miami Fire Fighters’ and Police Officers’
15 Retirement Trust as lead plaintiff and appointed Robbins Geller Rudman & Dowd as lead counsel;

16 WHEREAS, the parties have met and conferred, and agree that the interest of judicial
17 efficiency, administration of justice and conservation of judicial and private resources would be best
18 served by establishing a schedule to file a consolidated amended complaint and for briefing on
19 defendants’ anticipated motion to dismiss.

20 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO
21 APPROVAL BY THIS COURT, by the parties, through their respective counsel of record, as
22 follows:

- 23 1. Plaintiffs shall file their consolidated amended complaint on or before January 5,
24 2015;
- 25 2. Defendants shall file and serve their motion to dismiss on or before February 6, 2015;
- 26 3. Plaintiffs shall file and serve their opposition to defendants motion to dismiss on or
27 before March 6, 2015;

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1 4. Defendants shall file and serve their reply in support of their motion to dismiss on or
2 before March 20, 2015.

3 IT IS SO STIPULATED.

4 DATED: November 20, 2014

ROBBINS GELLER RUDMAN
& DOWD LLP
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8 s/Shawn A. Williams
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21 Additional Counsel for Plaintiff

22 DATED: November 20, 2014

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Attorney for Defendants Yelp Inc., Jeremy
Stoppelman, Robert J. Krolik and Geoffrey
Donaker

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Certificate Pursuant to Local Rule 5-1(i)(3)

I, Shawn A. Williams, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Establishing Schedule for Plaintiffs to File a Consolidated Amended Complaint and for Briefing on Defendants' Anticipated Motion to Dismiss. In compliance with Local Rule 5-1(i)(3), I hereby attest that counsel for defendants, Aaron Schur concurs in this filing.

Dated: November 20, 2014

s/Shawn A. Williams
SHAWN A. WILLIAMS

* * *

ORDER

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

IT IS SO ORDERED.

DATED: November 21, 2014

