Pursuant to Federal Rule of Civil Procedure 41(a), Plaintiffs Bradley Pattelli, Russell M. Joyce and James B. Gamache, and Defendant LendingClub Corporation, through their respective counsel of record, stipulate to voluntarily dismiss with prejudice the above-captioned action in its entirety pursuant to the terms of the parties' Confidential Settlement Agreement and Mutual General Release entered into on May 18, 2015 ("Settlement Agreement") with each party to bear

HOBART LINZER LLP

/s/ C. Dana Hobart C. Dana Hobart (SBN 125139)

Attorneys for Plaintiffs, Bradley Pattelli, Russell M. Joyce and James B. Gamache

FENWISK & WEST LLP

/s/ Kevin P. Muck Kevin P. Muck (SBN 120918)

Attorneys for Defendants, LendingClub Corporation

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this stipulation.

Sign Name: /s/ C. Dana Hobart C. Dana Hobart

REVISED STIPULATION AND [PROPOSED] ORDER FOR DISMISSAL OF ACTION

[PROPOSED] ORDER

PURSUANT TO REVISED STIPULATION, IT IS SO ORDERED.

Dated: May 27, 2015

The Holorable Maxine M. Chesney
United States District Judge

Hobart Linzer LLP 777 S. Figueroa Street, Suite 4000 Los Angeles, California 90017