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14 Co-Lead Counsel for Plaintiffs

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA

17	In re LEAPFROG ENTERPRISES, INC. SECURITIES LITIGATION	)	Master File No. 3:15-cv-00347-EMC
18	_____	)	<u>CLASS ACTION</u>
19	This Document Relates To:	)	STIPULATION AND [ <del>PROPOSED</del> ] ORDER
20	ALL ACTIONS.	)	TO EXTEND THE DEADLINE TO SUBMIT
21	_____	)	A PROPOSED PREMEDIATION DISCOVERY PLAN

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1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties – lead plaintiff KBC Asset  
2 Management NV (“Lead Plaintiff”) and defendants LeapFrog Enterprises, Inc., John Barbour, and  
3 Raymond L. Arthur (“Defendants”) – by and through their undersigned counsel of record, submit the  
4 following stipulation and proposed order:

5 WHEREAS, on multiple occasions the Court has granted the parties’ stipulated request to  
6 continue the scheduled Initial Case Management Conference (“CMC”) so that it is held at the same  
7 time as hearings on Defendants’ motions to dismiss (Dkt. Nos. 49, 69, 96, 99, 108);

8 WHEREAS, the Court’s February 24, 2017 Order Granting in Part and Denying in Part  
9 Defendants’ Motion to Dismiss (Dkt. No. 117) scheduled a CMC for April 6, 2017;

10 WHEREAS, a CMC was held on April 6, 2017 (Dkt. No. 123), wherein the Court directed  
11 the parties to meet and confer regarding a pre-mediation discovery plan to submit by stipulation to  
12 the Court by April 20, 2017 (Dkt. No. 123);

13 WHEREAS, the parties are continuing to discuss a private mediator for this action and an  
14 appropriate pre-mediation discovery plan;

15 WHEREAS, the parties have conferred and agreed, subject to Court approval, that an  
16 additional week to confer regarding an appropriate pre-mediation discovery plan to submit to the  
17 Court is necessary;

18 NOW, THEREFORE, the parties hereby agree and stipulate that the parties will submit a pre-  
19 mediation discovery plan to the Court by April 27, 2017.

20 DATED: April 18, 2017

21 ROBBINS GELLER RUDMAN  
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24 WILLOW E. RADCLIFFE  
25 MATTHEW S. MELAMED

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27 s/ Matthew S. Melamed  
28 MATTHEW S. MELAMED

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Co-Lead Counsel for Plaintiffs

DATED: April 18, 2017

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MARK R.S. FOSTER

\_\_\_\_\_  
s/ Mark R.S. Foster  
MARK R.S. FOSTER

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Attorneys for Defendants

1 I, Matthew S. Melamed, am the ECF User whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order to Extend the Deadline to Submit a Proposed Premediation  
3 Discovery Plan. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Mark R.S. Foster  
4 has concurred in this filing.

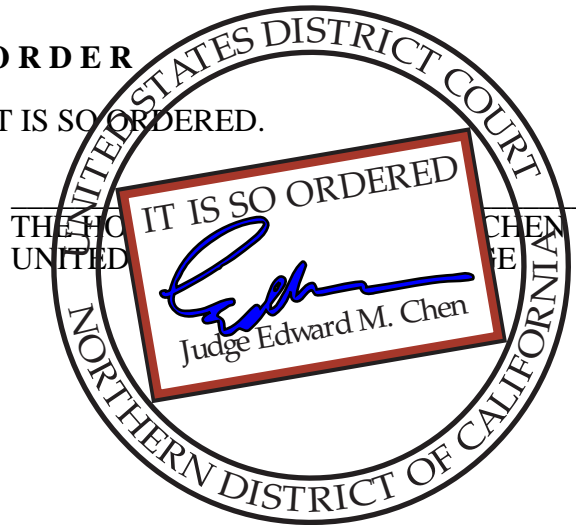
5 \_\_\_\_\_  
s/ Matthew S. Melamed  
MATTHEW S. MELAMED

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8 \* \* \*

9 **ORDER**

10 PURSUANT TO STIPULATION, IT IS SO ORDERED.

11 DATED: 4/19/17 \_\_\_\_\_



1 CERTIFICATE OF SERVICE

2 I hereby certify that on April 18, 2017, I authorized the electronic filing of the foregoing with  
3 the Clerk of the Court using the CM/ECF system which will send notification of such filing to the  
4 e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I  
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-  
6 CM/ECF participants indicated on the attached Manual Notice List.  
7

8 I certify under penalty of perjury under the laws of the United States of America that the  
9 foregoing is true and correct. Executed on April 18, 2017.

10 s/ Matthew S. Melamed  
11 MATTHEW S. MELAMED

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# Mailing Information for a Case 3:15-cv-00347-EMC In Re: LeapFrog Enterprise, Inc. Securities Litigation

## Electronic Mail Notice List

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## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)