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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 MEDIATION
21	_____	)	DEADLINE AND CONTINUE THE CASE
		)	MANAGEMENT CONFERENCE

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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 April 6, 2017, the Court directed the parties to complete private mediation  
6 and file an updated joint case management statement by July 6, 2017, and scheduled a case  
7 management conference for July 13, 2017 at 1:30 p.m. (Dkt. No. 123);

8 WHEREAS, on multiple occasions the Court has granted the parties’ stipulated request to  
9 continue the scheduled Initial Case Management Conference so that it was held at the same time as  
10 hearings on Defendants’ motions to dismiss (Dkt. Nos. 49, 69, 96, 99, 108), and on April 18, 2017,  
11 the Court granted the parties stipulated request to extend the deadline to submit a proposed  
12 premediation discovery plan (Dkt. No. 124);

13 WHEREAS, the parties have agreed to engage the Honorable James Ware (Ret.) to preside  
14 over a private mediation of this action;

15 WHEREAS, Judge Ware is unavailable during the last two weeks of June and the month of  
16 July;

17 WHEREAS, the parties and third parties are currently in the process of gathering documents  
18 for production in accordance with the Joint Pre-Mediation Discovery Plan submitted on April 27,  
19 2017 (Dkt. No. 127);

20 WHEREAS, the parties and Judge Ware are available for mediation on August 30, 2017;

21 WHEREAS, the parties have conferred and agreed, subject to Court approval, that: (i) the  
22 deadline to conduct private mediation should be continued to September 7, 2017; (ii) the deadline to  
23 file an updated joint case management statement should be extended to September 7, 2017; and  
24 (iii) the case management conference should be continued to September 14, 2017 at 1:30 p.m., or to  
25 another time convenient to the Court;

26 NOW, THEREFORE, the parties hereby agree and stipulate that:

27 (i) the deadline to conduct private mediation is continued to September 7, 2017;

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1 (ii) the deadline to file an updated joint case management statement is continued  
2 to September 7, 2017; and

3 (iii) the case management conference is continued to September 14, 2017 at  
4 10:30 a.m.  
~~1:30 p.m.~~, or to another time convenient to the Court.

5 DATED: May 25, 2017

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19 Co-Lead Counsel for Plaintiffs

20 DATED: May 25, 2017

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28 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 Mediation Deadline and Continue the Case  
3 Management Conference. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Mark  
4 R.S. Foster has concurred in this filing.

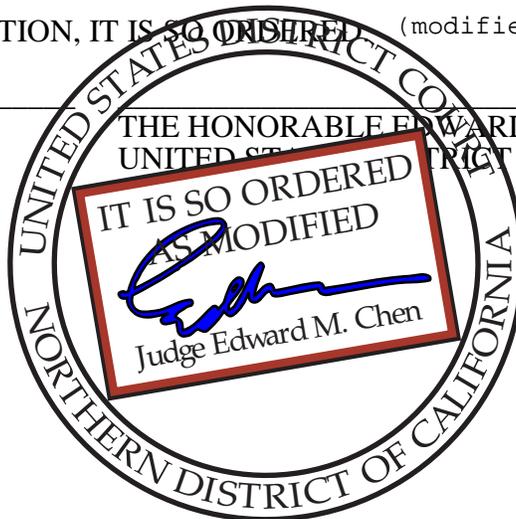
5 s/ Matthew S. Melamed  
6 MATTHEW S. MELAMED

7  
8 \* \* \*

9 **ORDER**

10 PURSUANT TO STIPULATION, IT IS SO ORDERED (modified above)  
11 5/31/17

11 DATED: \_\_\_\_\_  
12 THE HONORABLE EDWARD M. CHEN  
13 UNITED STATES DISTRICT JUDGE



1 CERTIFICATE OF SERVICE

2 I hereby certify that on May 25, 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 I certify under penalty of perjury under the laws of the United States of America that the  
8 foregoing is true and correct. Executed on May 25, 2017.

9 s/ 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)