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 LEAPFROG ENTERPRISES, INC., JOHN BARBOUR, and
 8 RAYMOND L. ARTHUR

9
 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

13
 14 IN RE LEAPFROG ENTERPRISES, INC.
 15 SECURITIES LITIGATION

Case No. 3:15-CV-00347-EMC

CLASS ACTION

16 This Document Relates To:
 17 ALL ACTIONS

**STIPULATION AND
 [PROPOSED] SCHEDULING
 ORDER**

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1 Pursuant to Civil Local Rule 7-12, the parties – lead plaintiff KBC Asset Management
2 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
4 the following stipulation and proposed order:

5 WHEREAS, on April 6, 2017, the Court directed the parties to complete private
6 mediation and file an updated joint case management statement by July 6, 2017, and scheduled a
7 case 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
10 as hearings on Defendants’ motions to dismiss (Dkt. Nos. 49, 69, 96, 99, 108);

11 WHEREAS, on May 31, 2017, the Court granted the parties’ stipulated request to extend
12 the deadline to conduct private mediation and to file an updated joint case management statement
13 to September 7, 2017, in light of the mediator’s schedule, and to continue the July 13, 2017 case
14 management conference to September 14, 2017;

15 WHEREAS, the parties conducted private mediation on August 30, 2017, but were
16 unable to reach a negotiated resolution of the action;

17 WHEREAS, lead trial counsel for Defendants plans to appear on behalf of Defendants at
18 the next case management conference, but will be out of the country on September 14, 2017;

19 WHEREAS, the parties have conferred and agreed, subject to Court approval, that:
20 (i) the deadline to file an updated joint case management statement should be extended to
21 September 21, 2017; and (ii) the case management conference scheduled for September 14, 2017
22 should be continued to September 28, 2017 at 10:30 a.m.

23 NOW, THEREFORE, the parties hereby agree and stipulate, subject to Court approval, as
24 follows:

- 25 1. The deadline for the parties to file an updated joint case management statement is
26 extended to September 21, 2017;
- 27 2. The case management conference scheduled for September 14, 2017 is continued to
28 September 28, 2017 at 10:30 a.m.

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DATED: July 6, 2017

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
WILLOW E. RADCLIFFE
MATTHEW S. MELAMED

/s/ Matthew S. Melamed
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Co-Lead Counsel for Plaintiffs

DATED: July 6, 2017

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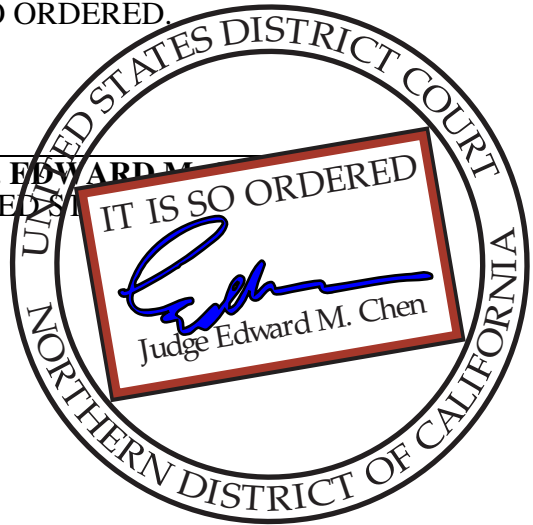
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/5/17

~~HON. EDWARD M. CHEN~~
~~UNITED STATES DISTRICT COURT~~



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ATTESTATION

I, Ryan M. Keats, am the ECF User whose ID and password are being used to file this **STIPULATION AND [PROPOSED] SCHEDULING ORDER**. In compliance with Civil L.R. 5-1, I hereby attest that Matthew S. Melamed concurred in this filing.

/s/ Ryan M. Keats

RYAN M. KEATS