

**ROBBINS GELLER RUDMAN  
& DOWD LLP**

Tricia L. McCormick (199239)  
triciam@rgrdlaw.com  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 231-1058  
Facsimile: (619) 231-7423

- and -

Shawn A. Williams (213113)  
shawnw@rgrdlaw.com  
Aelish Marie Baig (201279)  
aelishb@rgrdlaw.com  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: (415) 288-4545  
Facsimile: (415) 288-4534

*Liaison Counsel*

**MOTLEY RICE LLC**

Gregg S. Levin  
glevin@motleyrice.com  
David P. Abel  
dabel@motleyrice.com  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464  
Telephone: (843) 216-9000  
Facsimile: (843) 216-9450

- and -

**MOTLEY RICE LLC**

William H. Narwold  
bnarwold@motleyrice.com  
One Corporate Center  
20 Church St., 17th Floor  
Hartford, CT 06103  
Telephone: (860) 882-1681  
Facsimile: (860) 882-1682

*Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

TRENTON GLORE, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SANDISK CORP., SANJAY MEHROTRA,  
and JUDY BRUNER,

Defendants.

:  
: Lead Case No. 3:15-CV-01455-VC  
:  
: **REVISED STIPULATION AND**  
: **~~PROPOSED~~ ORDER REGARDING**  
: **TIME TO FILE CONSOLIDATED**  
: **CLASS ACTION COMPLAINT AND**  
: **SETTING SCHEDULE FOR BRIEFING**  
: **DEFENDANTS' MOTIONS TO DISMISS**  
: AS MODIFIED  
: CLASS ACTION

1 WHEREAS, on July 15, 2015, the Honorable Vince Chhabria issued an order consolidating  
2 cases 15-cv-01455-VC, 15-cv-02050-BLF (VC), and 15-cv-02358-VC and identifying 15-cv-01455-  
3 VC as the lead case (the “July 15 Order”);

4 WHEREAS, the July 15 Order appointed Union Asset Management Holding AG (“Union”) and  
5 KBC Asset Management NV (“KBC”) (together, the “Union Group Plaintiffs”) as Lead Plaintiffs;

6 WHEREAS, Lead Plaintiffs and defendants SanDisk Corp. (“SanDisk”), Sanjay Mehrotra, and  
7 Judy Bruner (collectively, “Defendants”), through their respective counsel, have conferred and agreed  
8 upon a date for Lead Plaintiffs to file a Consolidated Class Action Complaint (the “Consolidated  
9 Complaint”);

10 WHEREAS, Lead Plaintiffs and Defendants, through their respective counsel, have further  
11 agreed upon the dates for Defendants to answer, move to dismiss, or otherwise respond to the  
12 Consolidated Complaint, and the dates for briefing any such motion to dismiss;

13 WHEREAS, on May 22, 2015, the Court issued an order continuing the Case Management  
14 Conference (“CMC”) until September 29, 2015;

15 WHEREAS, on July 27, 2015, the Court issued an order stating, *inter alia*, that the parties  
16 should submit a revised scheduling stipulation and further indicating that any hearing on a motion to  
17 dismiss to be filed by Defendants shall be held “some time in December of this year” (*see* ECF No. 80);  
18 and

19 WHEREAS, in light of the current procedural posture of this case, the parties respectfully  
20 request the CMC and related CMC and ADR deadlines be continued as set forth below.

21 Accordingly, IT IS HEREBY STIPULATED AND AGREED, by the parties, through their  
22 undersigned counsel, subject to Court approval, as follows:

23 1. Lead Plaintiffs shall have until Friday, August 28, 2015 to file and serve their  
24 Consolidated Complaint.

25 2. Defendants shall file their answer or motion to dismiss the Consolidated Complaint by  
26 Wednesday, September 30, 2015.

1           3.       Lead Plaintiffs shall file their opposition to any motion to dismiss by Wednesday,  
2 November 4, 2015.

3           4.       Defendants shall file any reply in support of their motion to dismiss by Wednesday,  
4 November 25, 2015.

5           5.       The hearing on any motion to dismiss to be filed by Defendants shall be held on  
6 Thursday, December 10, 2015.

7           6.       The foregoing schedule may be modified by agreement of the parties with approval of  
8 the Court.

to January 19, 2016, at 10:00 a.m.

9           7.       The CMC is continued ~~with the following motion to dismiss is held.~~ Likewise, the  
10 deadlines for filing a Joint Case Management Statement or ADR documents pursuant to Civil L.R. 16-8  
11 and ADR L.R. 3-4 are continued accordingly.

12          8.       Pursuant to Local Rule 6-2 and 7-12, the foregoing schedule supersedes any other  
13 schedules provided in the Federal Rules or the Local Rules of the Court in any of the consolidated  
14 cases.

Respectfully submitted,

15  
16 Dated: July 29, 2015

**ROBBINS GELLER RUDMAN  
& DOWD LLP**

\_\_\_\_\_  
*s/ Aelish Marie Baig*  
AELISH MARIE BAIG

Susannah R. Conn (205085)  
sconn@rgrdlaw.com  
Tricia L. McCormick (199239)  
triciam@rgrdlaw.com  
Carissa J. Dolan (303887)  
cdolan@rgrdlaw.com  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: (619) 231-1058  
Facsimile: (619) 231-7423

- and -

Shawn A. Williams (213113)  
shawnw@rgrdlaw.com  
Aelish Marie Baig (201279)  
aelishb@rgrdlaw.com

1 Post Montgomery Center  
2 One Montgomery Street, Suite 1800  
3 San Francisco, CA 94104  
4 Telephone: (415) 288-4545  
5 Facsimile: (415) 288-4534

6 *Liaison Counsel*

7 **MOTLEY RICE LLC**  
8 Gregg S. Levin  
9 glevin@motleyrice.com  
10 David P. Abel  
11 dabel@motleyrice.com  
12 28 Bridgeside Boulevard  
13 Mt. Pleasant, SC 29464  
14 Telephone: (843) 216-9000  
15 Facsimile: (843) 216-9450

16 - and -

17 **MOTLEY RICE LLC**  
18 William H. Narwold  
19 bnarwold@motleyrice.com  
20 One Corporate Center  
21 20 Church St., 17th Floor  
22 Hartford, CT 06103  
23 Telephone: (860) 882-1681  
24 Facsimile: (860) 882-1682

25 *Lead Counsel for the Class*

26 Dated: July 29, 2015

27 **WILSON SONSINI GOODRICH & ROSATI**  
28 Professional Corporation

\_\_\_\_\_  
*s/ Boris Feldman*  
BORIS FELDMAN

29 Boris Feldman  
30 boris.feldman@wsgr.com  
31 Keith E. Eggleton  
32 keggleton@wsgr.com  
33 Michael R. Petrocelli  
34 mpetrocelli@wsgr.com  
35 Anne S. Aufhauser  
36 aaufhauser@wsgr.com  
37 650 Page Mill Road  
38 Palo Alto, CA 94304  
39 Telephone (650) 493-9300  
40 Facsimile: (650) 493-6811

*Attorneys for Defendants SanDisk Corporation, Sanjay Mehrotra, and Judy Bruner*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 I, Aelish M. Baig, am the ECF user whose ID and password are being used to file this  
2 Stipulation and [Proposed] Order Modifying Schedule for Lead Plaintiffs to File an Amended  
3 Complaint and for Briefing on Defendants' Anticipated Motion to Dismiss. In compliance with Local  
4 Rule 5- 1(i)(3), I hereby attest that counsel for Defendants, Boris Feldman, concurs in this filing.

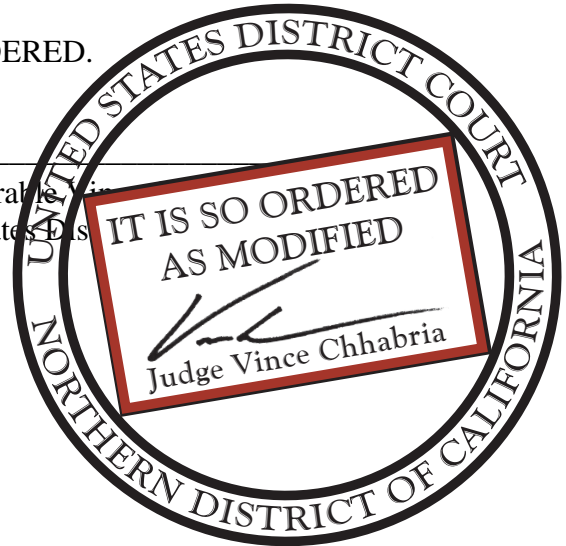
5 s/ Aelish Marie Baig

AELISH MARIE BAIG

6  
7 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

8 DATED: July 30, 2015

9  
10 The Honorable \_\_\_\_\_  
United States District Judge



CERTIFICATE OF SERVICE

1  
2 I hereby certify that on July 29, 2015, I authorized the electronic filing of the foregoing with the  
3 Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail  
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be  
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF  
6 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 July 29, 2015.

10 *s/ Aelish Marie Baig*

11 AELISH MARIE BAIG

12  
13 ROBBINS GELLER RUDMAN  
14 & DOWD LLP  
15 Post Montgomery Center  
16 One Montgomery Street, Suite 1800  
17 San Francisco, CA 94104  
18 Telephone: 415/288-4545  
19 415/288-4534 (fax)  
20 E-mail: aelishb@rgrdlaw.com  
21  
22  
23  
24  
25  
26  
27  
28

## Mailing Information for a Case 3:15-cv-01455-VC Union Asset Management Holding AG, et al v. SanDisk Corporation, et al

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **David Patrick Abel**  
dabel@motleyrice.com, aratliff@motleyrice.com
- **Anne Simons Aufhauser**  
aaufhauser@wsgr.com
- **Aelish Marie Baig**  
AelishB@rgrdlaw.com, e\_file\_sf@rgrdlaw.com
- **Susannah Ruth Conn**  
SConn@rgrdlaw.com
- **Carissa Jasmine Dolan**  
cdolan@rgrdlaw.com
- **Keith E. Eggleton**  
keggleton@wsgr.com, rdean@wsgr.com
- **Boris Feldman**  
boris.feldman@wsgr.com
- **Eli Greenstein**  
egreenstein@ktmc.com, jhouston@ktmc.com, mathcook@ktmc.com, yjayasuriya@ktmc.com, mswift@ktmc.com
- **Joseph P. Guglielmo**  
jguglielmo@scott-scott.com, edewan@scott-scott.com, trockett@scott-scott.com, efile@scott-scott.com
- **John Jasnoch**  
jjasnoch@scott-scott.com
- **Thomas L Laughlin , IV**  
tlaughlin@scott-scott.com, efile@scott-scott.com
- **Gregg S. Levin**  
glevin@motleyrice.com, dabel@motleyrice.com, erichards@motleyrice.com, kweil@motleyrice.com
- **Jeremy A Lieberman**  
jalieberman@pomlaw.com, disaacson@pomlaw.com, lpvega@pomlaw.com
- **Tricia Lynn McCormick**  
triciam@rgrdlaw.com, e\_file\_sd@rgrdlaw.com, e\_file\_sf@rgrdlaw.com
- **William H. Narwold**  
bnarwold@motleyrice.com, mjasinski@motleyrice.com, ajanelle@motleyrice.com
- **Jennifer Pafiti**  
jpafiti@pomlaw.com, kmsaletto@pomlaw.com, disaacson@pomlaw.com, cdberger@pomlaw.com, abarbosa@pomlaw.com
- **Michael Roland Petrocelli**  
mpetrocelli@wsgr.com
- **Mark Punzalan**  
markp@punzalanlaw.com, office@punzalanlaw.com
- **Laurence M. Rosen**  
lrosen@rosenlegal.com, larry.rosen@earthlink.net
- **Evan Jason Smith**  
esmith@brodsky-smith.com
- **Shawn A. Williams**  
shawnw@rgrdlaw.com, cdolan@rgrdlaw.com, aelishb@rgrdlaw.com, smorris@rgrdlaw.com, e\_file\_sd@rgrdlaw.com, sconn@rgrdlaw.com, e\_file\_sf@rgrdlaw.com

### 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)