

1 ROBERT L. DELL ANGELO (State Bar No. 160409)
 robert.dellangelo@mto.com
 2 ADAM I. KAPLAN (State Bar No. 268182)
 adam.kaplan@mto.com
 3 MUNGER, TOLLES & OLSON LLP
 355 South Grand Avenue, Thirty-Fifth Floor
 4 Los Angeles, California 90071-1560
 Telephone: (213) 683-9100
 5 Facsimile: (213) 687-3702
 6 Attorneys for Defendant Avalanche
 Biotechnologies, Inc.
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8 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

9 JOE HUANG, INDIVIDUALLY AND ON
 BEHALF OF ALL OTHERS SIMILARLY
 10 SITUATED,
 11 Plaintiffs,
 12 vs.
 13 AVALANCHE BIOTECHNOLOGIES, INC.,
 THOMAS W. CHALBERG, JR., AND LINDA C.
 14 BAIN,
 15 Defendants.

Case No. 3:15-cv-03185-SC

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER
 CONSOLIDATING RELATED
 ACTIONS; SETTING THE TIME FOR
 DEFENDANTS' RESPONSE TO
 PLAINTIFFS' CONSOLIDATED
 COMPLAINT AND ANY RELATED
 BRIEFING; AND STAYING
 DISCOVERY AND OTHER
 ACTIVITIES**

16 JEFFREY GALERMAN, Individually and on
 Behalf of All Others Similarly Situated,
 17 Plaintiffs,
 18 vs.
 19 AVALANCHE BIOTECHNOLOGIES, INC.,
 20 THOMAS W. CHALBERG, JR., and LINDA
 C. BAIN,
 21 Defendants.

Case No. 3:15-cv-03231-BLF

22 MARK MONDANARO, Individually and on
 Behalf of All Others Similarly Situated,
 23 Plaintiffs,
 24 vs.
 25 AVALANCHE BIOTECHNOLOGIES, INC.,
 26 THOMAS W. CHALBERG, JR., and LINDA C.
 BAIN,
 27 Defendants.
 28

Case No. 3:15-cv-03281-RMW

1 Pursuant to Fed. R. Civ. P. 16, Civil L.R. 23-1(b), and Manual for Complex Litigation,
2 Fourth §§ 11.12, 11.21 and 31 (2004), the parties stipulate, and the Court hereby orders, as
3 follows:

4 **CONSOLIDATION OF RELATED CASES**

5 1. The actions listed on Exhibit A are related cases within the meaning of Civil L.R.
6 3-12. Pursuant to Fed. R. Civ. P. 42(a), these cases are hereby consolidated into Civil Action No.
7 15-cv-03185-SC for pretrial proceedings before this Court. The consolidated action shall be
8 captioned: *In re Avalanche Biotechnologies Securities Litigation*.

9 2. All related actions that are subsequently filed in, or transferred to, this District shall
10 be consolidated into this action for pretrial purposes. This Order shall apply to every such related
11 action, absent order of the Court. Any party that objects to such consolidation, or to any other
12 provision of this Order, must file an application for relief from this Order within thirty (30) days
13 after the date on which a copy of the order is mailed to the party's counsel, pursuant to Paragraph
14 7, *infra*.

15 3. This Order is entered without prejudice to the rights of any party to apply for
16 severance of any claim or action, for good cause shown.

17 **MASTER DOCKET AND CAPTION**

18 4. The docket in Civil Action No. 15-cv-03185-SC shall constitute the Master Docket
19 for this action.

20 5. Every pleading filed in the consolidated action shall bear the following caption:

21
22 **UNITED STATES DISTRICT COURT**
23 **NORTHERN DISTRICT OF CALIFORNIA**

24 In re AVALANCHE BIOTECHNOLOGIES
25 SECURITIES, LITIGATION

Master File No.
15-cv-03185-SC

CLASS ACTION

26
27 This Document Relates To:
28

1 6. The file in Civil Action No. 15-cv-03185-SC shall constitute a Master File for
2 every action in the consolidated action. When the document being filed pertains to all actions, the
3 phrase “All Actions” shall appear immediately after the phrase “This Documents Relates To:”.
4 When a pleading applies only to some, not all, of the actions, the document shall list, immediately
5 after the phrase “This Documents Relates To:”, the docket number for each individual action to
6 which the document applies, along with the last name of the first-listed plaintiff in said action
7 (e.g., “Civil Action No. 15-cv-03185-SC (Huang)”).

8 7. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12
9 whenever a case that should be consolidated into this action is filed in, or transferred to, this
10 District. If the Court determines that the case is related, the clerk shall:

- 11 (a) place a copy of this Order in the separate file for such action;
- 12 (b) serve on plaintiff’s counsel in the new case a copy of this Order;
- 13 (c) direct that this Order be served upon defendants in the new case; and
- 14 (d) make the appropriate entry in the Master Docket.

15 **LEAD PLAINTIFF’S COUNSEL**

16 8. After the Court has designated a Lead Plaintiff, pursuant to 15 U.S.C. § 78u-
17 4(a)(3)(B), the Lead Plaintiff shall designate a law firm or firms to serve as Lead Plaintiff’s
18 Counsel, pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v). Lead Plaintiff’s Counsel shall have authority
19 to speak for, and enter into agreements on behalf of, plaintiffs in all matters regarding pretrial
20 procedures, discovery, and settlement negotiations. Lead Plaintiff’s Counsel shall manage the
21 prosecution of this litigation to avoid duplicative or unproductive activities. Lead Plaintiff’s
22 Counsel shall be responsible for coordination of all activities and appearances on behalf of
23 plaintiffs and for dissemination of notices and orders. Lead Plaintiff’s Counsel shall be
24 responsible for communications with the Court. Lead Plaintiff’s Counsel shall maintain a master
25 service list of all parties and counsel.

26 9. Defendants’ counsel may rely upon agreements made with Lead Plaintiff’s
27 Counsel. Such agreements shall be binding on all plaintiffs.

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PLEADINGS, MOTIONS, AND OTHER ACTIVITIES

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2 10. Defendants are not required to respond to the complaints filed in any action
3 consolidated into this action, other than a consolidated complaint or a complaint designated as the
4 operative complaint by the Lead Plaintiff.

5 11. Lead Plaintiff shall file a consolidated complaint within sixty (60) days after the
6 order designating the Lead Plaintiff is entered, unless otherwise agreed upon by the parties. The
7 consolidated complaint shall be the operative complaint and shall supersede all complaints filed in
8 any of the actions consolidated herein.

9 12. Defendants shall respond to the consolidated complaint within sixty (60) days after
10 service, unless otherwise agreed upon by the parties. If defendants file any motions directed at the
11 consolidated complaint, the opposition and reply briefs shall be filed within forty-five (45) days
12 and seventy-five (75) days, respectively, of that response, unless otherwise agreed upon by the
13 parties.

14 13. Apart from any briefing relating to the selection of the lead plaintiff and lead
15 plaintiff's counsel, all discovery and other activities shall be stayed until after Defendants respond
16 to the consolidated complaint and after any briefing related to Defendants' response to the
17 consolidated complaint, unless otherwise agreed upon by the parties or ordered by the Court.

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DATED: September 2, 2015

Respectfully submitted,

MUNGER, TOLLES & OLSON LLP

By: /s/ Adam I. Kaplan
Robert L. Dell Angelo (SBN 160409)
Adam I. Kaplan (SBN 268182)
355 South Grand Avenue, 35th Floor
Los Angeles, California 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
robert.dellangelo@mto.com
adam.kaplan@mto.com

*Attorneys for Defendant Avalanche
Biotechnologies, Inc.*

DATED: September 2, 2015

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence M. Rosen
Laurence M. Rosen, Esq. (SBN 219683)
355 S. Grand Avenue, Suite 2450
Los Angeles, CA 90071
Telephone: (213) 785-2610
Facsimile: (213) 226-4684
Email: lrosen@rosenlegal.com

Attorneys for Plaintiff Joe Huang

1 DATED: September 2, 2015

GLANCY PRONGAY & MURRAY LLP

2

3

By: /s/ Robert V. Prongay
Lionel Z. Glancy (SBN 134180)
Robert V. Prongay (SBN 270796)
Casey E. Sadler (SBN 274241)
1925 Century Park East, Suite 2100
Los Angeles, CA 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160
Email: rprongay@glancylaw.com

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Attorneys for Plaintiff Mark Mondanaro

9

10 DATED: September 2, 2015

POMERANTZ LLP

11

12

By: /s/ Jennifer Pafiti
Jennifer Pafiti (SBN 282790)
468 North Camden Drive
Beverly Hills, CA 90210
Telephone: (310) 285-5330
E-mail: jpafiti@pomlaw.com

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14

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16

POMERANTZ LLP
Jeremy A. Lieberman (Pro Hac Vice)
J. Alexander Hood II (Pro Hac Vice)
Marc Gorrie
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: 212-661-1100
Facsimile: 212-661-8665
E-mail: jalieberman@pomlaw.com
 ahood@pomlaw.com
 mgorrie@pomlaw.com

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POMERANTZ LLP
Patrick V. Dahlstrom
10 South La Salle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Facsimile: (312) 377-1184
E-mail: pdahlstrom@pomlaw.com

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Attorneys for Plaintiff Jeffrey Galerman

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Filer's Attestation

I, Adam I. Kaplan, am the ECF user whose identification and password are being used to file this JOINT STIPULATION AND PROPOSED ORDER. I hereby attest that the other above-named signatories concur in this filing.

DATED: September 2, 2015

By: /s/ Adam I. Kaplan
ADAM I. KAPLAN

THE FOREGOING STIPULATION
IS APPROVED AND IS SO ORDERED.

DATED: 09/22/2015


United States District Judge

EXHIBIT A

Exhibit A

1. *Joe Huang, Individually and on Behalf of All Others Similarly Situated, v. Avalanche Biotechnologies, Inc., Thomas W. Chalberg, Jr., And Linda C. Bain, Case No. 3:15-cv-03185-SC (filed July 9, 2015)*
2. *Jeffrey Galerman, Individually and on Behalf of All Others Similarly Situated, v. Avalanche Biotechnologies, Inc., Thomas W. Chalberg, Jr., And Linda C. Bain, Case No. 3:15-cv-03231-BLF (filed July 13, 2015)*
3. *Mark Mondanaro, Individually and on Behalf of All Others Similarly Situated, v. Avalanche Biotechnologies, Inc., Thomas W. Chalberg, Jr., And Linda C. Bain, Case No. Case No. 3:15-cv-03281-RMW (filed July 14, 2015)*