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

12 JOSEPH BODRI, Individually and on Behalf)
 of All Others Similarly Situated,)

13 Plaintiff,)

14 vs.)

15 GOPRO, INC., et al.,)
 16)

17 Defendants.)

Lead Case No. 3:16-cv-00232-JST

(CONSOLIDATED)

CLASS ACTION

STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND THE DEADLINE FOR
 PLAINTIFF TO FILE AN AMENDED
 COMPLAINT AND SETTING A BRIEFING
 SCHEDULE

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1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties – Lead Plaintiff Camia Investment
2 LLC (“Plaintiff”) and Defendants GoPro, Inc., Nicholas D. Woodman, Jack R. Lazar, and Anthony
3 J. Bates (“Defendants”) – by and through their undersigned counsel of record, submit the following
4 stipulation and proposed order:

5 WHEREAS, on March 17, 2016, the Court previously granted the parties’ stipulated request
6 to extend the time for Defendants to respond to the initial complaints and to continue the case
7 management conferences in this and related actions (Dkt. No. 48);

8 WHEREAS, on July 28, 2016, Plaintiff filed the Amended Consolidated Complaint for
9 Violations of the Federal Securities Laws (the “Complaint”) (Dkt. No. 90);

10 WHEREAS, on September 26, 2016, Defendants moved to dismiss the Complaint (Dkt. No.
11 94); on November 16, 2016, Plaintiff filed its opposition to Defendants’ motion (Dkt. No. 98); and
12 on December 22, 2016, Defendants filed their reply in support of their motion (Dkt. No. 100);

13 WHEREAS, on January 19, 2017, the Court heard argument on Defendants’ motion to
14 dismiss the Complaint and took the motion under submission (Dkt. No. 104);

15 WHEREAS, on May 1, 2017, the Court issued an Order granting Defendants’ motion to
16 dismiss the Complaint and providing Plaintiff 21 days, until May 22, 2017, to file an amended
17 complaint (Dkt. No. 109);

18 WHEREAS, due to the need for additional time to address the reasons given by the Court for
19 dismissing the Complaint and to scheduling conflicts in other cases, Plaintiff requested additional
20 time to file an amended complaint;

21 WHEREAS, the parties have met and conferred and have agreed, subject to Court approval,
22 that Plaintiff shall have until June 14, 2017 to file an amended complaint; and

23 WHEREAS, the parties have also conferred regarding a briefing schedule in anticipation of
24 Defendants’ motion to dismiss the amended complaint, and have agreed, subject to Court approval,
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1 that Defendants shall have until July 18, 2017 to file such a motion, that Plaintiff shall have until
2 August 17, 2017 to file an opposition, and that Defendants shall have until August 31, 2017 to file a
3 reply;

4 NOW, THEREFORE, the parties agree and stipulate that:

- 5 1. Plaintiff shall have until June 14, 2017 to file an amended complaint; and
6 2. In the event Plaintiff files an amended complaint and Defendants determine they will
7 move to dismiss the amended complaint:

- 8 (a) Defendants shall have until July 18, 2017 to file the motion;
9 (b) Plaintiff shall have until August 17, 2017 to file an opposition; and
10 (c) Defendants shall have until August 31, 2017 to file a reply.

11 DATED: May 17, 2017

12 ROBBINS GELLER RUDMAN
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17 s/ Matthew S. Melamed
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26 DATED: May 17, 2017

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28 CATHERINE KEVANE

s/ Catherine Kevane

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Attorneys for Defendants GoPro, Inc., Nicholas
D. Woodman Jack R. Lazar and Anthony J. Bates

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I, Matthew S. Melamed, am the ECF User whose ID and password are being used to file this Stipulation and ~~Proposed~~ Order to Extend the Deadline for Plaintiff to File an Amended Complaint and Setting a Briefing Schedule. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Catherine Kevane has concurred in this filing.

s/ Matthew S. Melamed
MATTHEW S. MELAMED

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 19, 2017



THE HONORABLE JONES S. TIGAR
UNITED STATES DISTRICT JUDGE

Mailing Information for a Case 3:16-cv-00232-JST Bodri v. GoPro, Inc. et al

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Manual Notice List

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- (No manual recipients)