Bodri v. GoPro, Ind. et al

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Pursuant to Civil Local Rules 3-12, 7-11 and 7-12, the Parties in each of the above-entitled actions, by and through their counsel, hereby stipulate to the following:

WHEREAS, on April 28, 2016, the Court appointed Camia Investment LLC ("Camia Investment") pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA") as lead plaintiff in this action to represent a putative class of investors who purchased GoPro securities between July 21, 2015, and January 13, 2016 (Dkt. No. 76);

WHEREAS, on April 28, 2016, the Court appointed Majesty Palms, LLLP ("Majesty Palms") pursuant to the PSLRA as lead plaintiff in this action to represent a putative class of investors who purchased GoPro securities between November 26, 2014, and July 20, 2015 (*id.*);

WHEREAS, Camia Investment's and Majesty Palms' amended pleadings were due to be filed on June 21, 2016, Defendants' motions to dismiss were due on August 22, 2016, responses in opposition to the motions to dismiss were due on October 21, 2016, replies in support of the motions to dismiss were due on November 21, 2016, and a hearing on the motions to dismiss was scheduled for December 22, 2016, at 2:00 p.m.;

WHEREAS, on June 21, 2016, Majesty Palms filed an administrative motion seeking an extension of 30 days to file an amended complaint (Dkt. No. 80);

WHEREAS, on June 21, 2016, Camia Investment filed a Consolidated Complaint for Violations of the Federal Securities Laws (Dkt. No. 81);

WHEREAS, on June 27, 2016, Defendants filed a statement of non-opposition to Majesty Palms' administrative motion and requested a single briefing schedule and hearing date for its anticipated motions to dismiss both the Camia Investment and Majesty Palms complaints (Dkt. No. 84);

WHEREAS, on June 28, 2016, the Court granted Majesty Palms' administrative motion for a 30-day extension of the due date to file its amended complaint, resulting in the complaint being due July 28, 2016 (Dkt. No. 85);

WHEREAS, on June 28, 2016, the Court also ordered the parties to meet and confer regarding a single briefing schedule and hearing date for Defendants' anticipated motions to dismiss (*id.*);

WHEREAS, the Parties have met and conferred and agreed on the following schedule in light of the Court's order and in consideration of fairness to all parties;

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the Parties,

- 1. Camia Investment shall have until July 28, 2016, to amend its Consolidated Complaint for Violations of the Federal Securities Laws without prejudice as to further amendment in the event that the Court grants Defendants' anticipated motion to dismiss Camia Investment's complaint, except that Defendants reserve their right to object to such further amendment on the ground that it is futile;
- 2. Defendants shall have until September 26, 2016, to respond to Camia Investment's and Majesty Palms' complaints; and
- 3. If Defendants' respond by moving to dismiss Camia Investment's and Majesty Palms' complaints:
 - o Plaintiffs shall have until November 16, 2016, to file responses in opposition to the motions to dismiss;
 - o Defendants shall have until December 22, 2016, to file replies in support of the motions to dismiss; and
 - o The Court shall hold hearings on the motions to dismiss at its earliest convenience after briefing is complete.

ROBBINS GELLER RUDMAN & DOWD LLP

Dated: July 18, 2016

By: /s/ Shawn A. Williams
Shawn A. Williams

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STIPULATION AND [PROPOSED] ORDER

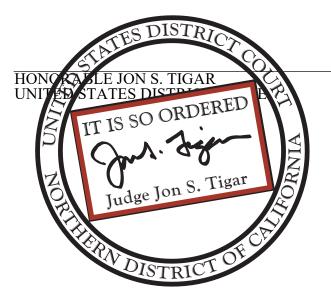
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25		•
26	Pursuant to Civil L.R. 5-1(i)(3), I, Patrice L. Bishop, attest that all other signatories listed	
27	and on whose behalf the filing is submitted, concur in the filing's content and have authorized the	
28	filing.	/s/_Patrice L. Bishop

STIPULATION AND [PROPOSED] ORDER Case No. 3:16-cv-00232-JST

[Proposed] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 19, 2016



STIPULATION AND [PROPOSED] ORDER Case No. 3:16-cv-00232-JST