

1 Patrice L. Bishop (182256)  
 pbishop@ssbla.com  
 2 **STULL, STULL & BRODY**  
 9430 W. Olympic Blvd., Suite 400  
 3 Beverly Hills, CA 90212  
 Tel: 310-209-2468  
 4 Fax: 310-209-2087

5 ***Counsel for Plaintiff Majesty Palms, LLLP***

6 [Additional Counsel on Signature Page]  
 7  
 8

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

13 JOSEPH BODRI, Individually and On  
 14 Behalf of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 GOPRO, INC., NICHOLAS WOODMAN,  
 18 and JACK LAZAR,

19 Defendants.  
 20  
 21  
 22

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

) CLASS ACTION

) **STIPULATION AND ~~[PROPOSED]~~**  
**ORDER CONCERNING BRIEFING**  
**SCHEDULE FOR MOTIONS TO DISMISS**

) JUDGE: Hon. Jon S. Tigar  
 ) CRTRM: 9, 19th Floor

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

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

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

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

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

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

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

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

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



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

Michael I. Fistel , Jr.  
Johnson & Weaver, LLP  
40 Powder Springs Street  
Marietta, GA 30064  
Tel: (770) 200-3104  
Fax: (770) 200-3101  
Email: [michaelf@johnsonandweaver.com](mailto:michaelf@johnsonandweaver.com)

***Attorneys for Camia Investment LLC***

STULL, STULL & BRODY

Dated: July 18, 2016

By: /s/ Patrice L. Bishop  
Patrice L. Bishop  
9430 West Olympic Blvd., Suite 400  
Beverly Hills, CA 90212  
Tel: (310) 209-2468  
Fax: (310) 209-2087  
Email: [pbishop@ssbla.com](mailto:pbishop@ssbla.com)

Thomas J. McKenna  
GAINEY McKENNA & EGGLESTON  
440 Park Avenue South, 5th Floor  
New York, NY 10016  
Tel: (212) 983-1300  
Fax: (212) 983-0383  
Email: [tjmckenna@gme-law.com](mailto:tjmckenna@gme-law.com)

***Attorneys for Plaintiff Majesty Palms, LLLP***

Dated: July 18, 2016

FENWICK & WEST LLP

By: /s/Catherine D. Kevane  
Catherine D. Kevane  
555 California Street, 12th Floor  
San Francisco, California 94104  
Tel: (415) 875-2300  
Fax: (415) 281-1350  
Email: [ckevane@fenwick.com](mailto:ckevane@fenwick.com)

***Attorneys for Defendants  
GoPro, Inc., Nicholas Woodman,  
Jack Lazar, and Anthony Bates***

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

/s/ Patrice L. Bishop

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

~~Proposed~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 19, 2016

HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT COURT

