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11 Attorneys for Defendants LendingClub Corporation,
Daniel T. Ciporin, Jeffrey Crowe, Carrie Dolan, Rebecca
12 Lynn, John J. Mack, Mary Meeker, John C. (Hans) Morris,
Lawrence H. Summers and Simon Williams

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION

18 IN RE LENDINGCLUB SECURITIES
19 LITIGATION

Case No. 3:16-CV-02627-WHA

CLASS ACTION

**STIPULATION AND [~~PROPOSED~~] ORDER
RESCHEDULING HEARING ON
MOTIONS TO DISMISS**

21 This Document Relates To:

22 ALL ACTIONS

1 Pursuant to the Northern District of California Civil Local Rules (“Local Rules”) 6-1, 6-2,
2 and 7-12, defendants LendingClub Corporation (“LendingClub” or the “Company”), Daniel T.
3 Ciporin, Jeffrey Crowe, Carrie Dolan, Rebecca Lynn, John J. Mack, Mary Meeker, John C.
4 (Hans) Morris, Lawrence H. Summers and Simon Williams (collectively, the “LendingClub
5 Defendants”), defendant Renaud Laplanche, defendants Morgan Stanley & Co. LLC, Goldman,
6 Sachs & Co., Credit Suisse Securities (USA) LLC, Citigroup Global Markets Inc., Allen &
7 Company LLC, Stifel, Nicolaus & Company, Incorporated, BMO Capital Markets Corp., William
8 Blair & Company, L.L.C., and Wells Fargo Securities, LLC (collectively, the “Underwriter
9 Defendants” and together with the other defendants, the “Defendants”), and lead plaintiff Water
10 and Power Employees’ Retirement, Disability and Death Plan of the City of Los Angeles (“Lead
11 Plaintiff” and together with Defendants, the “Parties”) in the above-captioned action, by and
12 through their counsel, hereby stipulate to the following:

13 WHEREAS, on January 20, 2017, Defendants filed motions to dismiss the Consolidated
14 Complaint (“Motions to Dismiss”) [Dkt. Nos. 139, 142 and 148], and noticed a hearing date of
15 March 2, 2017;

16 WHEREAS, prior to filing the Motions to Dismiss, on November 10, 2016, the Parties,
17 which at that time did not include the Underwriter Defendants, filed the Joint Case Management
18 Conference Statement [Dkt. No. 117] which requested that the hearing on motions to dismiss not
19 be set during the week of March 6 through 10, 2017, due to scheduling conflicts;

20 WHEREAS, on February 8, 2017, the Court entered a notice continuing the hearing to
21 March 8, 2017 [Dkt. No. 155];

22 WHEREAS, the Parties have met and conferred, obtained from the Court alternative
23 available dates for the hearing, and have agreed that the hearing should be set for March 23, 2017,
24 at 8:00 a.m.;

25 **IT IS ACCORDINGLY STIPULATED**, by and between the undersigned counsel for
26 the parties, that subject to approval by the Court, the hearing on the Motions to Dismiss should be
27 rescheduled from March 8, 2017 to **March 23, 2017, at 8:00 a.m.**

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1 Dated: February 16, 2017

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By: /s/ Marie C. Bafus

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10 Dated: February 16, 2017

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*Lead Counsel for Lead Plaintiff
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Dated: February 16, 2017

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Dated: February 16, 2017

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William Blair & Company, L.L.C., and Wells
Fargo Securities, LLC*

Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this stipulation.

Dated: February 16, 2017

By: /s/ Marie C. Bafus

Marie C. Bafus

* * *

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that the hearing on
defendants' motions to dismiss is continued to March 23, 2017 at 8:00 a.m.

Dated: February 17, 2017.



Hon. William H. Alsup
United States District Court Judge