

1 Lionel Z. Glancy (SBN #134180)
 2 Robert V. Prongay (SBN #270796)
 3 Joshua L. Crowell (SBN #295411)
GLANCY PRONGAY & MURRAY LLP
 4 1925 Century Park East, Suite 2100
 Los Angeles, California 90067
 Telephone: (310) 201-9150
 Facsimile: (310) 201-9160
 Email: rprongay@glancylaw.com

6 J. Brandon Walker
 7 Todd H. Henderson
BRAGAR EAGEL & SQUIRE, P.C.
 8 885 Third Avenue, Suite 3040
 New York, New York 10022
 Telephone: (212) 308-5858
 Facsimile: (212) 486-0462
 Email: walker@bespc.com

11 Attorneys for Lead Plaintiffs

12 **UNITED STATES DISTRICT COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

15 ROBERT CRAGO, Individually And On Behalf
 16 Of All Others Similarly Situated,

17 Plaintiff,

18 v.

19 THE CHARLES SCHWAB CORPORATION,
 20 CHARLES SCHWAB & CO., INC., CHARLES
 R. SCHWAB, and WALTER W. BETTINGER
 21 II,

22 Defendants.

Case No. 3:16-cv-3938-RS

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER FOR EXTENSION OF TIME TO
 FILE AMENDED COMPLAINT**

1 Lead Plaintiffs Robert Wolfson and Frank Pino (“Lead Plaintiffs”) and Defendants The
2 Charles Schwab Corp., Charles Schwab & Co., Inc., Charles R. Schwab, and Walter W. Bettinger II
3 (“Defendants”), by and through their respective counsel, have met and conferred and hereby
4 stipulate as follows:

5 WHEREAS, pursuant to a stipulated order entered by the Court on November 18, 2016
6 (ECF No. 41), Lead Plaintiffs’ amended complaint is due January 13, 2017;

7 WHEREAS, due to the recent illnesses of certain attorneys handling the case for Co-Lead
8 Counsel, Lead Plaintiffs sought Defendants’ consent to a one-week extension of time to file the
9 amended complaint;

10 WHEREAS, Lead Plaintiffs and Defendants have met and conferred about extending all
11 deadlines previously stipulated to in this action by one week and the parties mutually agree, with the
12 Court’s approval, that the new deadlines shall be as follows:

- | | | |
|----|-------------------|--|
| 13 | January 20, 2017: | Lead Plaintiffs Filing Amended Complaint |
| 14 | March 10, 2017: | Schwab’s Motion to Dismiss |
| 15 | April 21, 2017: | Lead Plaintiffs’ Opposition to Schwab’s Motion |
| 16 | May 19, 2017: | Schwab’s Reply |

17 WHEREAS, the parties further agree that in light of the foregoing circumstances and in the
18 interest of judicial efficiency, administration and justice, as well as conservation of judicial and
19 private resources, the Initial Case Management Conference should be continued until after the Court
20 has decided Schwab’s motion to dismiss and there is an operative complaint on file; and

21 WHEREAS, this is the parties’ first request for an extension of any deadline in this case.

22 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO**
23 **APPROVAL BY THIS COURT**, by these parties through their respective counsel of record, as
24 follows:

- 25 1. Lead Plaintiffs’ deadline to file a new complaint will be January 20, 2017;
- 26 2. Schwab’s deadline to file its motion to dismiss will be March 10, 2017;

1 3. Lead Plaintiffs' deadline to file its opposition to Schwab's motion will be
2 April 21, 2017;

3 4. Schwab's deadline to file its reply to its motion will be May 19, 2017;

4 5. The initial case management conference and all accompanying deadlines will be
5 continued until after the Court decides Schwab's motion to dismiss and there is an operative
6 complaint on file; and

7 6. The parties do not seek to reset these dates for the purpose of delay. The proposed
8 new dates will not have an effect on any pre-trial and trial dates as the Court has yet to schedule
9 these dates.
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11 SO STIPULATED.
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1 Dated: January 12, 2017

GLANCY PRONGAY & MURRAY LLP

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3 By: /s/ Joshua L. Crowell
4 Robert V. Prongay (#270796)
5 Joshua L. Crowell (#295411)
6 1925 Century Park East, Suite 2100
7 Los Angeles, California 90067
8 Telephone: (310) 201-9150
9 Facsimile: (310) 201-9160
10 Email: info@glancylaw.com

Co-Lead Counsel for Lead Plaintiffs and the Class

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12
13 **BRAGAR EAGEL & SQUIRE, P.C.**

14 By: /s/ J. Brandon Walker
15 J. Brandon Walker
16 Todd H. Henderson
17 885 Third Avenue, Suite 3040
18 New York, New York 10022
19 Telephone: (212) 308-5858
20 Facsimile: (212) 486-0462
21 walker@bespc.com
22 henderson@bespc.com

Co-Lead Counsel for Lead Plaintiffs and the Class

23 Dated: January 12, 2017

ARNOLD & PORTER KAYE SCHOLER LLP

24 By: /s/ Gilbert R. Serota
25 Gilbert R. Serota
26 Three Embarcadero Center, 10th Floor
27 San Francisco, CA 94111-4024
28 Telephone: (415) 471-3170
Facsimile: (415) 471-3400
gilbert.serota@apks.com

Attorneys for Defendants

