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Liaison Counsel

Lead Counsel for the Class

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

DORIS SHENWICK, et al.,

Plaintiff,

v.

TWITTER, INC., et al.,

Defendants.

Case No. 3:16-cv-05314-JST

**STIPULATION AND ~~PROPOSED~~
 SCHEDULING ORDER AND REQUEST
 TO ASSOCIATE ADDITIONAL COUNSEL**

CLAIRE DEGENHARDT, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiff,

v.

TWITTER, INC., RICHARD COSTOLO and
 ANTHONY NOTO,

Defendants.

Case No. 3:16-cv-05439-JST

1 Pursuant to Civil Local Rule 7-12, the parties, lead plaintiff KBC Asset Management NV
2 (“KBC” or “Lead Plaintiff”) and defendants Twitter, Inc., Richard Costolo, and Anthony Noto
3 (collectively, “Defendants”), by and through their undersigned counsel of record, submit the following
4 stipulation and proposed order:

5 WHEREAS, on December 22, 2016, the Court held a hearing on pending motions to appoint
6 Lead Plaintiff and Lead Counsel and to consolidate two related securities fraud cases, ECF No. 71;

7 WHEREAS, on the same day, the Court issued a written order granting KBC’s motion for
8 appointment as Lead Plaintiff, approving its selection of Motley Rice LLC (“Motley Rice”) as Lead
9 Counsel and Bleichmar Fonti & Auld LLP as liaison counsel, and consolidating *Shenwick v. Twitter*,
10 No. 3:16-cv-05314, with *Degenhardt v. Twitter*, No. 3:16-cv-05439, ECF No. 72;

11 WHEREAS, during the December 22, 2016 hearing, the Court ordered the parties to submit by
12 January 13, 2017 a stipulated or competing proposed case schedule(s), said schedule(s) to include a date
13 for an initial case management conference (“CMC”), and to address Lead Plaintiff’s intent to associate
14 certain counsel, ECF No. 71;

15 WHEREAS, the parties have met, conferred, and agreed on a proposed schedule;

16 NOW THEREFORE, the parties hereby agree and stipulate to the following:

- 17 1. Lead Plaintiff shall file a Consolidated Amended Complaint no later than March 2, 2017;
- 18 2. An initial CMC shall be scheduled for April 19, 2017 at 2:00 p.m.;
- 19 3. Defendants’ Motion to Dismiss Plaintiffs’ Consolidated Amended Complaint (“Motion
20 to Dismiss”) shall be filed on or before May 2, 2017;
- 21 4. Lead Plaintiff’s opposition to Defendants’ Motion to Dismiss shall be filed on or before
22 June 21, 2017;
- 23 5. Defendants’ Reply Memorandum in support of their Motion to Dismiss shall be filed on
24 or before August 7, 2017; and
- 25 6. The hearing on Defendants’ anticipated Motion to Dismiss shall be scheduled for
26 Thursday, September 14, 2017 at 2:00 p.m.

1 **OTHER MATTERS**

2 During the December 22, 2016 hearing, Lead Counsel mentioned its intent to associate Robbins
3 Geller Rudman & Dowd LLP (“Robbins Geller”) in this case to work at Lead Plaintiff and Lead
4 Counsel’s direction in light of Robbins Geller’s extensive investigation and development of the case
5 which work product would be needlessly duplicative and expensive to replicate. Lead Counsel’s
6 association of additional counsel will not increase fees or costs potentially borne by the putative class.

7 Defendants take no position on Lead Counsel’s request to associate Robbins Geller.

8 Dated: January 13, 2017

Respectfully submitted,

9 BLEICHMAR FONTI & AULD LLP

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26 *Lead Counsel for the Class*

27 Dated: January 13, 2017

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28 By: /s/ Simona G. Strauss
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13 *Attorneys for Defendants Twitter, Inc., Anthony*
14 *Noto, and Richard Costolo*

15 I, Lesley E. Weaver, am the ECF User whose ID and password are being used to file this
16 Stipulation and [Proposed] Scheduling Order and Request to Associate Additional Counsel. In
17 compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Simona G. Strauss has concurred in this
18 filing.

19 /s/ Lesley E. Weaver

20 Lesley E. Weaver

21 Pursuant to Stipulation, the foregoing schedule is adopted by the Court. In addition, the Court
22 approves Lead Counsel's association of Robbins Geller Rudman & Dowd LLP.

23 **IT IS SO ORDERED.**

24 DATED: January 18, 2017

25 
26 THE HONORABLE JON S. TIGAR
27 UNITED STATES DISTRICT JUDGE
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