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 11 [Additional Counsel on Signature Page]

12  
 13 **UNITED STATES DISTRICT COURT**  
 14 **NORTHERN DISTRICT OF CALIFORNIA**

15 GARY HEFLER, Individually and on Behalf of )  
 16 All Others Similarly Situated, )  
 17 Plaintiff, )  
 18 vs. )  
 19 WELLS FARGO & COMPANY, JOHN G. )  
 20 STUMPF, JOHN R. SHREWSBERRY and )  
 CARRIE L. TOLSTEDT, )  
 21 Defendants. )

Case No. 3:16-cv-05479-JST  
**JOINT STIPULATION AND**  
**[PROPOSED] ORDER TO ENLARGE**  
**TIME TO RESPOND TO COMPLAINT**  
 The Hon. Jon S. Tigar

22 STEVE KLEIN, Individually and on Behalf of )  
 23 All Others Similarly Situated, )  
 24 Plaintiff, )  
 25 vs. )  
 26 WELLS FARGO & COMPANY, JOHN G. )  
 STUMPF, JOHN R. SHREWSBERRY and )  
 27 CARRIE L. TOLSTEDT, )  
 28 Defendants. )

Case No. 3:16-cv-05513-JST

1           WHEREAS on September 26, 2016, Gary Hefler, individually and on behalf of all others  
2 similarly situated, filed a putative Class Action Complaint For Violations Of the Federal Securities Laws  
3 (the “Hefler Complaint”) against Wells Fargo & Company (“Wells Fargo”), John G. Stumpf, John R.  
4 Shrewsberry, and Carrie L. Tolstedt (collectively, “Defendants”);

5           WHEREAS on September 28, 2016, Steve Klein, individually and on behalf of all others  
6 similarly situated, filed a putative Class Action Complaint For Violations Of the Federal Securities Laws  
7 (the “Klein Complaint”) against Defendants;

8           WHEREAS Gary Hefler and Steve Klein (together, “Plaintiffs”) and Defendants  
9 anticipate that the above-captioned cases will be consolidated, that a lead plaintiff and lead counsel will  
10 be appointed by the Court, and that a Consolidated Class Action Complaint will be filed thereafter;

11           WHEREAS Plaintiffs and Defendants have agreed to extend the time in which  
12 Defendants may respond to Plaintiffs’ complaint until 60 days following the filing of a Consolidated  
13 Class Action Complaint;

14           WHEREAS no prior extensions have been granted for the time in which Defendants  
15 could respond to the Hefler Complaint or the Klein Complaint;

16           WHEREAS the parties agree that nothing in this Stipulation will be construed as a waiver  
17 of any of Defendants’ or Plaintiffs’ rights or positions in law or in equity;

18           NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between  
19 Plaintiffs, by and through their counsel, and Defendants, by and through their counsel, that:

20           1.       Defendants’ time to respond to the complaints in the above-captioned actions is  
21 hereby extended for 60 days following the filing of a Consolidated Class Action Complaint.

22           2.       In submitting this Stipulation, Defendants and Plaintiffs do not waive any of their  
23 rights or positions in law or in equity, and Defendants do not waive any objection or defense they may  
24 raise to the Court’s personal jurisdiction over them or to the propriety of venue in this case.

1 IT IS SO STIPULATED.

2  
3 Dated: November 18, 2016

4 /s/ Brendan P. Cullen  
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19 *Counsel for Defendant Wells Fargo &*  
20 *Company*

21  
22 Dated: November 18, 2016

23 /s/ Grant P. Fondo  
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*Counsel for Defendant John G. Stumpf*

29  
30 Dated: November 18, 2016

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*Counsel for Defendant John R.*  
*Shrewsberry*

1 Dated: November 18, 2016

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/s/ Brendan V. Sullivan, Jr.

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(*pro hac vice* forthcoming)

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/s/ Jennifer Pafiti

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*Counsel for Plaintiff Steve Klein*

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**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Brendan P. Cullen, in compliance with General Order 45, Section X(B), hereby attest that I obtained the concurrence of all of the above-listed counsel in filing this document.

DATED: November 18, 2016

/s/ Brendan P. Cullen  
Brendan P. Cullen

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**ORDER**

THE FOREGOING STIPULATION  
IS APPROVED AND IT IS SO ORDERED.

Dated: November 21, 2016

  
\_\_\_\_\_  
THE HONORABLE JON S. TIGAR  
UNITED STATES DISTRICT JUDGE