

1 Brendan P. Cullen (SBN 194057)
 (cullenb@sullcrom.com)
 2 Sverker K. Hogberg (SBN 244640)
 (hogbergs@sullcrom.com)
 3 Ryan J. McCauley (SBN 264913)
 (mccauleyr@sullcrom.com)
 4 SULLIVAN & CROMWELL LLP
 1870 Embarcadero Road
 5 Palo Alto, California 94303
 Telephone: (650) 461-5600
 6 Facsimile: (650) 461-5700

7 Christopher M. Viapiano (*pro hac vice* forthcoming)
 (viapianoc@sullcrom.com)
 8 SULLIVAN & CROMWELL LLP
 1700 New York Avenue, N.W., Suite 700
 9 Washington, D.C. 20006
 Telephone: (202) 956-6985
 10 Facsimile: (202) 956-7056

11 *Counsel for Defendant Wells Fargo & Company*

12 [Additional Counsel on Signature Page]

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

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

Case No. 3:16-cv-05479-JST

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO CONTINUE
 CASE MANAGEMENT CONFERENCE
 AND SET BRIEFING SCHEDULE**

The Hon. Jon S. Tigar

1 STEVE KLEIN, Individually and on Behalf of)
All Others Similarly Situated,)
2)
3 Plaintiff,)
4 vs.)
5 WELLS FARGO & COMPANY, JOHN G.)
STUMPF, JOHN R. SHREWSBERRY and)
6 CARRIE L. TOLSTEDT,)
7 Defendants.)

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

8
9 WHEREAS, on January 5, 2017, the Court held a hearing on Plaintiff Union Asset
10 Management Holding AG's ("Union") motion to consolidate the above captioned actions (the "Related
11 Securities Class Actions"), to appoint Union as Lead Plaintiff, and to approve Union's selection of
12 counsel for the class (Dkt. No. 29) (the "Motion");

13 WHEREAS, on January 5, 2017, the Court issued an Order Consolidating Cases and
14 Appointing Lead Plaintiff and Lead Counsel (Dkt. No. 58), which granted the Motion;

15 WHEREAS, at the January 5, 2017, hearing the Court invited the parties to file a
16 stipulation to continue the case management conference currently set for January 25, 2017 (the "CMC"),
17 which was set automatically by the Court's electronic docketing software;

18 WHEREAS, on November 21, 2016, the Court entered the parties' Joint Stipulation and
19 [Proposed] Order to Enlarge Time to Respond to Complaint (Dkt. No. 23), pursuant to which the parties
20 agreed to extend the time in which Defendants may respond until 60 days following the filing of a
21 Consolidated Class Action Complaint;
22

23 WHEREAS, the parties have now met and conferred and have agreed to a schedule for
24 Lead Plaintiff to file a Consolidated Class Action Complaint and to a briefing schedule on Defendants'
25 forthcoming motions to dismiss the Consolidated Class Action Complaint;
26

1 WHEREAS, the parties believe that the interests of judicial efficiency and economy
2 would be best served by continuing the CMC until after the Court has heard and issued an order on
3 Defendants' forthcoming motions to dismiss the Consolidated Class Action Complaint;

4 WHEREAS, the parties agree that nothing in this Stipulation will be construed as a
5 waiver of any of Defendants' or Lead Plaintiff's rights or positions in law or in equity;

6
7 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Lead
8 Plaintiff, by and through its counsel, and Defendants, by and through their counsel, that:

- 9 1. Lead Plaintiff shall file a Consolidated Class Action Complaint on or before
10 March 6, 2017.
- 11 2. Defendants shall respond to the Consolidated Class Action Complaint, by filing
12 motions to dismiss or otherwise, on or before May 5, 2017.
- 13 3. Lead Plaintiff shall file oppositions to Defendants' motions to dismiss, if any, on
14 or before July 7, 2017.
- 15 4. Defendants shall file replies in support of their motions to dismiss, if any, on or
16 before August 11, 2017.
- 17 5. The CMC currently scheduled for January 25, 2017 shall be continued to a date
18 and time, to be set by the Court subject to its availability, following the Court's ruling on the
19 Defendants' forthcoming motions to dismiss.
20
21

22 Dated: January 11, 2017

23 /s/ Brendan P. Cullen
24 Brendan P. Cullen (SBN 194057)
25 Sverker K. Hogberg (SBN 244640)
26 Ryan J. McCauley (SBN 264913)
27 SULLIVAN & CROMWELL LLP
28 1870 Embarcadero Road
Palo Alto, California 94303
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

1 Christopher M. Viapiano
2 (*pro hac vice* forthcoming)
3 SULLIVAN & CROMWELL LLP
4 1700 New York Avenue, N.W., Suite 700
5 Washington, D.C. 20006
6 Telephone: (202) 956-6985
7 Facsimile: (202) 956-7056

Counsel for Defendant Wells Fargo & Company

8 Dated: January 11, 2017

9 /s/ Grant P. Fondo
10 Grant P. Fondo (SBN 181530)
11 Richard M. Strassberg
12 (*pro hac vice* forthcoming)
13 GOODWIN PROCTER LLP
14 135 Commonwealth Drive
15 Menlo Park, California 94025
16 Telephone: (650) 752-3100
17 Facsimile: (650) 853-1038

Counsel for Defendant John G. Stumpf

18 Dated: January 11, 2017

19 /s/ Ismail Ramsey
20 Ismail Ramsey (SBN 189820)
21 Miles Ehrlich (SBN 237954)
22 RAMSEY & EHRLICH LLP
23 803 Hearst Avenue
24 Berkeley, California 94710
25 Telephone: (510) 548-3600
26 Facsimile: (650) 291-3060

Counsel for Defendant John R. Shrewsberry

27 Dated: January 11, 2017

28 /s/ Enu A. Mainigi
Enu A. Mainigi
(*pro hac vice* forthcoming)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington D.C. 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029

Counsel for Defendant Carrie L. Tolsted

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Dated: January 11, 2017

/s/ William H. Narwold
William H. Narwold (admitted *pro hac vice*)
MOTLEY RICE LLC
One Corporate Center, 20 Church St.
Hartford, Connecticut 06103
Telephone: (860) 882-1676

Gregg S. Levin (admitted *pro hac vice*)
MOTLEY RICE LLC
28 Bridgeside Blvd.
Mt. Pleasant, South Carolina 29464
Telephone: (843) 216-9000

Counsel for Lead Plaintiff

Shawn A. Williams (SBN 213113)
Jason C. Davis (SBN 253370)
Aelish M. Baig (SBN 201279)
ROBBINS GELLER RUDMAN
& DOWD LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone: (415) 288-4545

Liaison Counsel

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: January 11, 2017

/s/ Brendan P. Cullen
Brendan P. Cullen

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ORDER

THE FOREGOING STIPULATION IS APPROVED AND IT IS SO ORDERED.

Dated: January 11, 2017



THE HONORABLE DON S. TIGAR
UNITED STATES DISTRICT JUDGE