

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

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

10 *Counsel for Defendant Wells Fargo & Company*
 11 [Additional Counsel on Signature Page]

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

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)
 21 CARRIE L. TOLSTEDT,)
 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.)
 27 STUMPF, JOHN R. SHREWSBERRY and)
 28 CARRIE L. TOLSTEDT,)
 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
5 Brendan P. Cullen (SBN 194057)
6 Sverker K. Hogberg (SBN 244640)
7 SULLIVAN & CROMWELL LLP
8 1870 Embarcadero Road
9 Palo Alto, California 94303
10 Telephone: (650) 461-5600
11 Facsimile: (650) 461-5700

12 Christopher M. Viapiano
13 (*pro hac vice* forthcoming)
14 SULLIVAN & CROMWELL LLP
15 1700 New York Avenue, N.W., Suite 700
16 Washington, D.C. 20006
17 Telephone: (202) 956-6985
18 Facsimile: (202) 956-7056

19 *Counsel for Defendant Wells Fargo &*
20 *Company*

21 Dated: November 18, 2016

22 /s/ Grant P. Fondo
23 Grant P. Fondo (SBN 181530)
24 Richard M. Strassberg
25 (*pro hac vice* forthcoming)
26 GOODWIN PROCTER LLP
27 135 Commonwealth Drive
28 Menlo Park, California 94025
Telephone: (650) 752-3100
Facsimile: (650) 853-1038

Counsel for Defendant John G. Stumpf

Dated: November 18, 2016

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

Counsel for Defendant John R.
Shrewsberry

1 Dated: November 18, 2016

2

3

4

5

6

7

8

9

10 Dated: November 18, 2016

11

12

13

14

15

16

17

18 Dated: November 18, 2016

19

20

21

22

23

24

25

26

27

28

/s/ Brendan V. Sullivan, Jr.

Brendan V. Sullivan, Jr.
(*pro hac vice* forthcoming)

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. Tolstedt

/s/ Shawn A. Williams

Shawn A. Williams (SBN 213113)
Aelish M. Baig (SBN 201279)
Jason C. Davis (SBN 253370)
ROBBINS GELLER RUDMAN & DOWD
LLP

One Montgomery Street, Suite 1800
San Francisco, California 94104
Telephone: (415) 288-4545
Facsimile: (415) 288-4534

Counsel for Plaintiff Gary Hefler

/s/ Jennifer Pafiti

Jennifer Pafiti (SBN 282790)
POMERANTZ LLP
468 North Camden Drive
Beverly Hills, California 90210
Telephone: (818) 532-6499

Counsel for Plaintiff Steve Klein

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

THE FOREGOING STIPULATION
IS APPROVED AND IT IS SO ORDERED.

Dated: November 21, 2016



THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE