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11 UNITED STATES DISTRICT COURT
 12 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 IN RE PAYPAL HOLDINGS, INC.
 14 SHAREHOLDER DERIVATIVE
 15 LITIGATION

Lead Case No. 3:17-cv-00162-RS
 (Consolidated with Nos. 3:17-cv-02206;
 3:17-cv-02428; and 5:17-cv-02446)

16 This Document Relates To:
 17
 18 ALL ACTIONS.

16 **STIPULATION AND ~~[PROPOSED]~~**
ORDER MODIFYING BRIEFING
SCHEDULE FOR MOTION TO DISMISS

Hon. Richard Seeborg
 Courtroom 3, 17th Floor

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1 WHEREAS, on July 31, 2017, in accordance with the Court's June 30, 2017, Consolidation
2 Order, Plaintiffs designated the complaint filed in *Liss v. Schulman, et al.*, Case No. 5:17-cv-02446-
3 as the operative complaint in this Consolidated Derivative Action (the "Operative Complaint");

4 WHEREAS, on September 28, 2017, nominal defendant PayPal Holdings, Inc. ("PayPal")
5 filed a motion to dismiss Plaintiffs' Operative Complaint ("MTD"), along with a request for judicial
6 notice in support thereof ("RJN");

7
8 WHEREAS, pursuant to the Consolidation Order, the deadline for Plaintiffs to file
9 response(s) to PayPal's MTD and RJN is November 13, 2017;

10 WHEREAS, the parties have conferred regarding the current briefing schedule for Plaintiffs'
11 response(s) to PayPal's MTD and RJN and, in light of certain unanticipated scheduling issues on the
12 part of Plaintiffs' counsel, have agreed to a short extension of time for Plaintiffs' response(s); and

13
14 WHEREAS, should the Court not enter an order consistent with this stipulation, defendants
15 will not argue that Plaintiffs failed to timely file their response brief(s), to the extent Plaintiffs are
16 relying on the parties' agreement in this stipulation;

17 NOW, THEREFORE, the undersigned parties hereby stipulate and agree, and respectfully
18 request that the Court enter an order as follows:

- 19 1. Plaintiffs' response(s) to PayPal's MTD and RJN shall be filed no later than
20 November 16, 2017.
21
22 2. PayPal's reply brief(s) shall be filed no later than December 7, 2017.
23
24 3. The hearing on PayPal's MTD shall remain set for December 14, 2017.

25 Dated: November 8, 2017

ROBBINS ARROYO LLP
BRIAN J. ROBBINS
FELIPE J. ARROYO
SHANE P. SANDERS
SCOTT F. TEMPLETON

26
27 */s/ Shane P. Sanders*

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SHANE P. SANDERS

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Co-Lead Counsel for Plaintiffs

Dated: November 8, 2017

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ALEXANDER K. TALARIDES
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/s/ Alexander K. Talarides

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Counsel for Defendants

1 **SIGNATURE ATTESTATION**

2 I, Shane P. Sanders, am the ECF user whose identification and password are being used to
3 file the foregoing Stipulation and [Proposed] Order Modifying Briefing Schedule for Motion to
4 Dismiss. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this
5 document has been obtained.
6

7 Dated: November 8, 2017

/s/ Shane P. Sanders

SHANE P. SANDERS

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11 **ORDER**

12 Based on the Stipulation of the signed parties, and good cause appearing, IT IS HEREBY
13 ORDERED that the Stipulation is approved. The hearing is hereby continued to 12/21/2017 at 1:30 pm.
14

15 It is so ORDERED.

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17 DATED: 11/8/17



18 THE HONORABLE RICHARD SEEBORG
19 UNITED STATES DISTRICT JUDGE
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