

1 Jennifer Pafiti (SBN 282790)
POMERANTZ LLP
 2 468 North Camden Drive
 Beverly Hills, CA 90210
 3 Telephone: (818) 532-6499
 4 E-mail: jpafiti@pomlaw.com

5 **Attorney for Plaintiff**
 - additional counsel on signature page –

6
 7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10
 11 RONALD SGARLATA, Individually and on
 12 Behalf of All Others Similarly Situated,
 Plaintiff,
 13 v.
 14 PAYPAL HOLDINGS, INC., DANIEL H.
 15 SCHULMAN, JOHN D. RAINEY JR., and
 HAMED SHAHBAZI,
 16 Defendants.

Case No.: 3:17-cv-06956

STIPULATION AND ~~[PROPOSED]~~ ORDER

Date Action Filed: December 6, 2017

1 WHEREAS, the above-captioned action is a proposed class action alleging violations of
2 the federal securities laws against PayPal Holdings, Inc. (“Paypal” or the “Company”), Daniel H.
3 Schulman (“Schulman”), John D. Rainey Jr. (“Rainey”), and Hamed Shahbazi (“Shahbazi”)
4 (collectively, “Defendants”);

5 WHEREAS, this action is subject to the requirements of the Private Securities Litigation
6 Reform Act of 1995, Pub. L. No. 104-67, 109 Stat. 737 (1995) (the “PSLRA”), which sets forth
7 specialized procedures for the administration of securities class actions;

8 WHEREAS, on March 16, 2018, the Court entered an order appointing movants Michael
9 Eckert and Edwin Bell as Interim Co-Lead Plaintiffs and approving their choices of Pomerantz
10 LLP and The Rosen Law Firm, P.A. as Interim Co-lead Counsel (Dkt. No. 31);

11 WHEREAS, on March 30, 2018, the Court entered an order regarding the timing of the
12 filing of an amended complaint and Defendants Paypal, Schulman, and Rainey’s response thereto
13 (Dkt. No.41) (“Scheduling Order”);

14 WHEREAS, Shahbazi was not a party to the previously entered Scheduling Order and at
15 the time of the filing of the previous stipulation, Interim Co-Lead Counsel was negotiating the
16 issue of service of process with Shahbazi’s Canadian counsel; and

17 WHEREAS, so that the schedule of Shahbazi’s response to an amended complaint is
18 consistent with the schedule for PayPal, Schulman, and Rainey’s response;

19 IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the
20 parties, that:

- 21 1. Pursuant to the Court’s Order dated March 30, 2018 (Docket No. 41) Interim Co-Lead
22 Plaintiffs shall file an amended complaint on or before June 12, 2018;
- 23 2. Defendant Shahbazi shall file his response to the amended complaint within thirty
24 (30) days after the filing of the amended complaint; and
- 25 3. If Defendant Shahbazi moves to dismiss the amended complaint, Interim Co-Lead
26 Plaintiffs’ opposition shall be due within thirty (30) days after the filing of the
27 motion(s) to dismiss; and any replies shall be due within twenty (20) days after the
28 filing of Interim Co-Lead Plaintiffs’ opposition.

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

Dated: April 5, 2018

POMERANTZ LLP

By: /s/ Louis Ludwig
Jennifer Pafiti
468 North Camden Drive
Beverly Hills, CA 90210
Phone: 818.532.6499
Email: jpafiti@pomlaw.com

Jeremy A. Lieberman
J. Alexander Hood II
600 Third Avenue, 20th Floor
New York, NY 10016
Phone: 212.661.1100
Fax: 212.661.8665
Email: jalieberman@pomlaw.com
ahood@pomlaw.com

Patrick V. Dahlstrom
Louis C. Ludwig
Ten South La Salle Street, Suite 3505
Chicago, IL 60603
Phone: 312.377.1181
Fax: 312.377.1184
Email: pdahlstrom@pomlaw.com
lcludwig@pomlaw.com

Interim Co-Lead Counsel

Dated: April 5, 2018

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence Rosen
Laurence Rosen
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071
Telephone: (213) 785-2610
Facsimile: (213) 226-4684
Email: lrosen@rosenlegal.com

Interim Co-Lead Counsel

1 Pursuant to Civil L.R. 5-1(i)(3), all signatories concur in filing this stipulation.

2 Dated: April 5, 2018

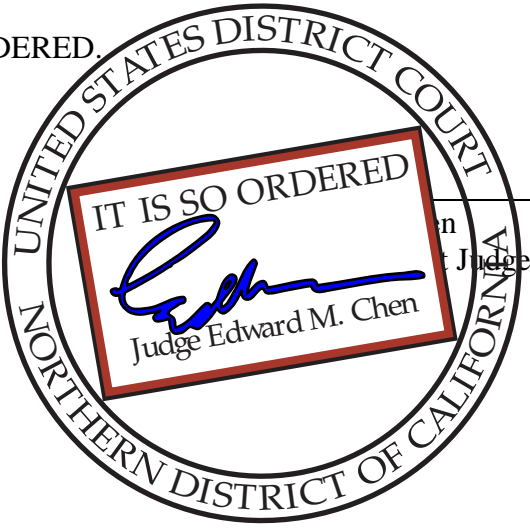
FENWICK & WEST LLP
By: /s/ Jay L. Pomerantz
Jay L. Pomerantz
801 California Street
Mountain View, CA 94041
Phone: (650) 335-7691
Email: jpomerantz@fenwick.com

Counsel for Defendant Hamed Shahbazi

[~~PROPOSED~~] ORDER

8
9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10
11 Dated: 4/6/18



28