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 Attorneys for PayPal Holdings, Inc.,  
 9 Daniel H. Schulman and John D. Rainey, Jr.

10 [additional counsel on signature page]

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

RONALD SGARLATA, Individually and on )  
 Behalf of All Others Similarly Situated, )  
 )  
 Plaintiffs, )  
 )  
 vs. )  
 )  
 PAYPAL HOLDINGS, INC., DANIEL H. )  
 SCHULMAN, JOHN D. RAINEY JR., and )  
 HAMED SHAHBAZI, )  
 )  
 Defendants. )  
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Case No. 3:17-cv-06956-EMC  
**STIPULATION AND ~~PROPOSED~~**  
**ORDER CONTINUING INITIAL CASE**  
**MANAGEMENT CONFERENCE**

1           WHEREAS, on March 5, 2018, the Court continued the Initial Case Management  
2 Conference (“CMC”) from March 8, 2018 to April 19, 2018, and set the deadline for the parties  
3 to file a joint CMC Statement to April 12, 2018;

4           WHEREAS, on March 29, 2018, the parties filed a joint CMC Statement;

5           WHEREAS on March 30, 2018 and April 6, 2018, the Court ordered that (i) Interim Co-  
6 Lead Plaintiffs shall file an amended complaint by June 12, 2018; (ii) Defendants shall file their  
7 responses to the amended complaint within thirty (30) days after the filing of the amended  
8 complaint; (iii) if any Defendant moves to dismiss the amended complaint, Interim Co-Lead  
9 Plaintiffs’ oppositions shall be due within thirty (30) days after the filing of the motion(s) to  
10 dismiss; and (iv) any replies shall be due within twenty (20) days after the filing of Interim Co-  
11 Lead Plaintiffs’ opposition;

12           WHEREAS, on April 6, 2018, the Court continued the CMC from April 19, 2018 to April  
13 26, 2018;

14           WHEREAS, this action is governed by the Private Securities Litigation Reform Act of  
15 1995 (“PSLRA”), under which all “discovery and other proceedings” are automatically stayed  
16 pending determination of any motion(s) to dismiss,

17           WHEREAS the parties have met and conferred, and agree to continue the CMC until after  
18 the Court has decided any and all motion(s) to dismiss any amended complaint filed by Interim  
19 Co-Lead Plaintiffs.

20           NOW THEREFORE, the undersigned parties hereby stipulate and agree, and respectfully  
21 request, that the Court enters an order as follows:

22           1.       The April 26, 2018 CMC is continued until after the Court decides any and all  
23 motion(s) to dismiss any amended complaint filed by Interim Co-Lead Plaintiffs.

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Dated: April 23, 2018

JAMES N. KRAMER  
ALEXANDER K. TALARIDES  
SUZETTE J. BARNES  
Orrick, Herrington & Sutcliffe LLP

/s/ Alexander K. Talarides  
ALEXANDER K. TALARIDES

Attorneys for Defendants  
PayPal Holdings, Inc., Daniel H. Schulman, and John  
D. Rainey, Jr.

I, Alexander K. Talarides, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Continuing Initial Case Management Conference. In compliance with General Order 45, X.B., I hereby attest that Jay L. Pomerantz has concurred in this filing.

Dated: April 23, 2018

JAY L. POMERANTZ  
Fenwick & West LLP

/s/ Jay L. Pomerantz  
JAY POMERANTZ

Counsel for Defendant Hamed Shahbazi

I, Alexander K. Talarides, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Continuing Initial Case Management Conference. In compliance with General Order 45, X.B., I hereby attest that Patrick V. Dahlstrom has concurred in this filing.

Dated: April 23, 2018

JENNIFER PAFITI  
JEREMY A. LIEBERMAN  
PATRICK V. DAHLSTROM  
LOUIS C. LUDWIG  
Pomerantz LLP

/s/ Patrick V. Dahlstrom  
PATRICK V. DAHLSTROM

Counsel for Interim Co-Lead Plaintiff Michael Eckert

1 I, Alexander K. Talarides, am the ECF user whose ID and password are being used to file  
2 this Stipulation and [Proposed] Order Continuing Initial Case Management Conference. In  
3 compliance with General Order 45, X.B., I hereby attest that Jonathan Stern has concurred in  
4 this filing.

4 Dated: April 23, 2018

LAURENCE ROSEN  
JONATHAN STERN  
The Rosen Law Firm, P.A.

7 /s/ Jonathan Stern  
8 JONATHAN STERN

9 Counsel for Interim Co-Lead Plaintiff Edwin Bell

12 ~~[PROPOSED]~~ ORDER

13 Pursuant to the Stipulation of the Parties, **IT IS SO ORDERED.** The CMC is reset  
14 from 4/26/18 to 8/30/18 at 9:30 a.m. Joint CMC statement shall be  
15 filed by 8/23/18.

16 Dated: ~~4/25/2018~~

17 The Honorable Edward M. Chen  
18 UNITED STATES DISTRICT COURT JUDGE

