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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

FENWICK & WEST LLP
 ATTORNEYS AT LAW
 SAN FRANCISCO

13 JONG MIN PARK, Individually and on Behalf
 14 of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 GOPRO, INC., NICHOLAS D. WOODMAN
 18 AND BRIAN T. MCGEE,

19 Defendants.

Master File No.: 3:18-cv-00193-EMC

CLASS ACTION

(modified)

**STIPULATION AND ~~PROPOSED~~
 ORDER SETTING SCHEDULE FOR
 FILING RESPONSE TO
 CONSOLIDATED COMPLAINT AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE AND ASSOCIATED
 DEADLINES**

Date Action Filed: January 11, 2018

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1 WHEREAS, this action is a proposed class action alleging violations of the federal
2 securities laws against GoPro, Inc. (“GoPro” or the “Company”), Nicholas Woodman and Brian
3 McGee (collectively, “Defendants”);

4 WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995, Pub. L. No.
5 104-67, 109 Stat. 737 (1995) (the “Reform Act”), which sets forth specialized procedures for the
6 administration of securities class actions, on April 19, 2018, this Court issued a Minute Order
7 conditionally appointing Lead Plaintiffs and Lead Counsel and ordering that the Consolidated
8 Amended Complaint be filed within 60 days (*i.e.*, June 18, 2018) (Dkt. No. 58);

9 WHEREAS, on April 26, 2018 the Court gave final approval of the appointment of Julie
10 Wiegand and Michael Birlenbach as Lead Plaintiffs (Dkt. No. 62);

11 WHEREAS, following appointment of Lead Plaintiffs and their counsel, the parties have
12 met and conferred and agreed on a schedule for Defendants’ responses to the Consolidated
13 Amended Complaint;

14 WHEREAS, pursuant to the proposed briefing schedule, the parties respectfully submit
15 that good cause exists to vacate the July 12, 2018 initial case management conference and
16 associated ADR deadlines until such time as the Court has the opportunity to rule on Defendants’
17 anticipated motion to dismiss; and

18 IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 7-12, by and between the
19 undersigned counsel for the parties, that:

20 1. Defendants shall answer, move or otherwise respond to the Consolidated Amended
21 Complaint on or before August ¹²~~17~~, 2018;

22 2. In the event that Defendants file a motion to dismiss, Lead Plaintiffs shall file an
23 opposition to the motion on or before August ²³~~1~~, 2018;

24 3. Defendants shall file any reply on or before ^{September 6}~~November 1~~, 2018;

25 4. Defendants’ anticipated motion to dismiss shall be noticed for hearing on
26 ^{September 20}~~December 6~~, 2018 at 1:30 p.m.; and

27 5. Pursuant to Civil L.R. 16-2, the initial case management conference scheduled for
28 July 12, 2018 shall be vacated, along with any associated deadlines under the Federal Rules of

1 Civil Procedure and Local Rules, to be rescheduled for a date after the Court rules on Defendants'
2 ~~anticipated motion to dismiss, as the Court determines to be appropriate;~~ and all associated ADR
3 Multi-Option Program deadlines likewise be deferred.

4 6. Neither Plaintiffs nor Defendants waive their rights to seek from each other or the
5 Court adjournments or extensions of the above deadlines.

6 Dated: May 2, 2018

FENWICK & WEST LLP

7 By: /s/ Catherine D. Kevane
8 Catherine D. Kevane

9 Attorneys for Defendants GoPro, Inc., Nicholas D.
Woodman and Brian T. McGee

10 Dated: May 2, 2018

THE ROSEN LAW FIRM, P.A.

11 By: /s/ Jacob Goldberg
12 Jacob Goldberg

13 Co-Lead Counsel for Lead Plaintiffs Julie Wiegand and
Michael Birlenbach

14 Dated: May 2, 2018

POMERANTZ LLP

15 By: /s/ Leigh H. Smollar
16 Leigh H. Smollar

17 Co-Lead Counsel for Lead Plaintiffs Julie Wiegand and
Michael Birlenbach

18 Pursuant to Civil Local Rule 5-1(i)(3), all signatories concur in filing this stipulation.

19 Dated: May 2, 2018

20 By: /s/ Catherine D. Kevane
Catherine D. Kevane

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23 ~~[PROPOSED]~~ ORDER

24 PURSUANT TO STIPULATION, IT IS SO ORDERED. (modified)

25
26 Dated: May 11, 2018

27 The Honorable
United States District Judge

