

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 *Counsel for Defendants Wells Fargo & Company,*
Charles W. Scharf, and John Shrewsberry

7 *[Additional counsel listed on signature page]*
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12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
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15 GUOFENG Ma, Individually and On Behalf of
 16 All Others Similarly Situated,

Plaintiff,

17 v.
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19 WELLS FARGO & COMPANY, CHARLES W.
 20 SCHARF, and JOHN SHREWSBERRY,

Defendants.
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Case No. 3:20-cv-03697-RS

**STIPULATION AND ORDER
 SETTING SCHEDULE FOR FILING
 AMENDED COMPLAINT AND FOR
 DEFENDANTS TO RESPOND**

The Hon. Richard Seeborg

1 WHEREAS, on June 4, 2020, Guofeng Ma, individually and on behalf of all others
2 similarly situated, filed a putative class action Complaint for Violations of the Federal Securities Laws
3 against Wells Fargo & Company (“Wells Fargo”), Charles W. Scharf, and John R. Shrewsberry
4 (collectively, “Defendants”);

5 WHEREAS, on July 13, 2020, the Court entered a Stipulation and [Proposed] Order
6 Waiving Service of Summons and Complaint, Extending Defendants’ Time to Respond to Complaint,
7 and Continuing Initial Case Management Conference as Modified by the Court (ECF No. 11) (the
8 “Scheduling Order”), which (i) ordered that Defendants need not respond to the initial complaint filed in
9 this action, (ii) directed the parties to jointly propose a schedule within 10 days of the appointment of a
10 lead plaintiff for the filing of a consolidated amended complaint and for the briefing of Defendants’
11 anticipated motion to dismiss, and (iii) continued the Initial Case Management Conference to September
12 24, 2020;

13 WHEREAS, on September 8, 2020, the Court entered the Order Appointing Lead
14 Plaintiff and Lead Counsel (ECF No. 31), which appointed George Kwinecki as Lead Plaintiff and The
15 Rosen Law Firm, P.A. as Lead Counsel;

16 WHEREAS, pursuant to the Scheduling Order, the parties have met and conferred
17 regarding a schedule for Lead Plaintiff to file a consolidated amended complaint and for briefing
18 Defendants’ forthcoming motion to dismiss the consolidated amended complaint;

19 WHEREAS, this case is a putative securities fraud class action governed by the Private
20 Securities Litigation Reform Act of 1995 (“PSLRA”), which provides for a stay of “all discovery and
21 other proceedings” during the pendency of any motion to dismiss. 15 U.S.C. § 78u-4(b)(3)(B).

22 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
23 the undersigned parties, through their undersigned counsel, and subject to the Court’s approval, that:

- 24 1. Lead Plaintiff shall file a consolidated amended complaint on or before November 16,
25 2020.
- 26 2. Defendants shall respond to the consolidated amended complaint by January 15, 2021.
- 27 3. If Defendants respond to the consolidated amended complaint by filing a motion to
28 dismiss, Lead Plaintiff shall file an opposition to the motion by March 16, 2021.

1 4. If Defendants respond to the consolidated amended complaint by filing a motion to
2 dismiss, Defendants shall file a reply in support of their motion to dismiss by April 30, 2021.

3 5. The Initial Case Management Conference currently set for September 24, 2020 is
4 continued to May 27, 2021. The parties shall meet and confer prior to this Initial Case Management
5 Conference pursuant to Fed. R. Civ. P. 26, and submit a joint case management statement by May 20,
6 2021.

7 IT IS SO STIPULATED.

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9 DATED: September 14, 2020

/s/ Brendan P. Cullen

Brendan P. Cullen (SBN 194057)
(cullenb@sullcrom.com)
Sverker K. Hogberg (SBN 244640)
(hogbergs@sullcrom.com)
SULLIVAN & CROMWELL LLP
1870 Embarcadero Road
Palo Alto, California 94303-3308
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

*Counsel for Defendants Wells Fargo & Company,
Charles W. Scharf, and John Shrewsberry*

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16 DATED: September 14, 2020

/s/ Laurence M. Rosen

Laurence M. Rosen, Esq. (SBN 219683)
(lrosen@rosenlegal.com)
THE ROSEN LAW FIRM, P.A.
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071
Telephone: (213) 785-2610
Facsimile: (213) 226-4684

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22 Yu Shi (*pro hac vice*)
(yshi@rosenlegal.com)
THE ROSEN LAW FIRM, P.A.
275 Madison Avenue, 40th Floor
New York, NY 10016
Telephone: (212) 686-1060
Facsimile: (212) 202-3827

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Counsel for Lead Plaintiff George Kwinecki

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 14, 2020



HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE

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