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 Attorneys for Defendant  
 7 ELECTRONIC ARTS INC.

8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 OAKLAND DIVISION

11  
 12 GEOFFREY PECOVER and ANDREW  
 OWENS, on Behalf of Themselves and All  
 13 Others Similarly Situated,

14 Plaintiffs,

15 v.

16 ELECTRONIC ARTS INC.,  
 17

18 Defendant.  
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CASE NO. C 08-02820 CW

**JOINT ADMINISTRATIVE MOTION AND  
 [PROPOSED] ORDER FOR CASE  
 SCHEDULE MODIFICATION**

Action Filed: June 5, 2008  
 Judge: The Honorable Claudia Wilken

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1           Class Plaintiffs and Defendant Electronic Arts Inc. (“EA”) are pleased to report they have  
2 reached a settlement in principle. Accordingly they hereby jointly move the Court to continue all  
3 existing deadlines in this case for 60 days in order to allow the parties time to attempt to negotiate  
4 a definitive settlement agreement.

5           On Friday, May 4, 2012, the parties mediated this case with former U.S. District Court  
6 Judge Layn R. Phillips. Judge Phillips, presently of Irell & Manella LLP, is one of the leading  
7 complex litigation mediators in the United States and has successfully mediated a number of cases  
8 in this district. The mediation session with Judge Phillips was highly productive and resulted in a  
9 settlement in principal that is reflected in a nonbinding letter of intent executed by the parties.  
10 The letter of intent provides that the parties shall have 45 days to negotiate in good faith regarding  
11 a definitive settlement agreement, which remains subject to approval by all parties, and thereafter  
12 by the Court.

13           Should the Court believe it would be helpful, Judge Phillips has generously offered to  
14 address the status of this matter with the Court and in particular the reasons the parties require 45  
15 days to complete their negotiations. The parties jointly consent to this and waive the mediator’s  
16 privilege to the extent necessary for the Court to communicate with Judge Phillips, as they believe  
17 Judge Phillips is in the best position to address the mediation/settlement status and provide further  
18 details to the Court. Judge Phillips telephone number is (949) 760-5296, and his email address is  
19 LPhillips@irell.com. Judge Phillips has indicated that he is available presently to speak with the  
20 Court on this matter.

21           Because upcoming litigation events, including extensive expert discovery and briefing of  
22 dispositive motions and other pre-trial motions, will incur considerable expense, and will therefore  
23 make settlement more difficult and expensive, the parties jointly request that the case schedule be  
24 modified in the interim. For these reasons, the parties jointly file this administrative motion to  
25 request that the Court continue all pending litigation deadlines for 60 days, and set a Case

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1 Management Conference for July 12, 2012.

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3 Dated: May 7, 2012

Respectfully Submitted,

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LATHAM & WATKINS LLP

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Daniel M. Wall  
Timothy L. O'Mara

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By \_\_\_\_\_ /s/ Timothy L. O'Mara

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Timothy L. O'Mara  
Attorneys for Defendant  
ELECTRONIC ARTS, INC.

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10 Dated: May 7, 2012

Respectfully Submitted,

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HAGENS BERMAN SOBOL SHAPIRO LLP

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Shana Scarlett

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THE PAYNTER LAW FIRM PLLC

14

Stuart M. Paynter

15

By \_\_\_\_\_ /s/ Shana Scarlett

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Shana Scarlett  
CLASS COUNSEL

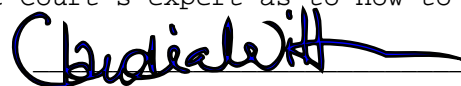
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19 **[PROPOSED] ORDER**

20 Good cause appearing therefore, IT IS HEREBY ORDERED that all outstanding deadlines  
21 in this case are continued for 60 days, except that the date for hearing motions is  
22 continued to Thursday, September 27, 2012. The pretrial conference and jury  
23 trial dates are vacated, to be reset if necessary at the case management  
24 conference. A case management conference will be held on Thursday, July 19th,  
25 at 2:00 p.m. The parties shall advise the Court's expert as to how to proceed.

26 DATED: 5/10/2012 \_\_\_\_\_

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HONORABLE Claudia Wilken  
UNITED STATES DISTRICT COURT JUDGE

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