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13 [Additional counsel appear on signature page.]

14 UNITED STATES DISTRICT COURT  
 15  
 16 NORTHERN DISTRICT OF CALIFORNIA

17 PIPE FITTERS LOCAL UNION NO. 120	)	No. 11-CV-01064-CW
18 PENSION FUND, On Behalf of Itself and All	)	
19 Others Similarly Situated,	)	STIPULATED ORDER ESTABLISHING
	)	DEADLINES, BRIEFING SCHEDULES,
20 Plaintiff,	)	AND HEARING DATES
	)	
21 vs.	)	
	)	
22 BARCLAYS CAPITAL INC., THE	)	Judge: The Hon. Claudia Wilken
23 GOLDMAN SACHS GROUP, INC.,	)	Courtroom: 2, 4th Floor
24 KOHLBERG KRAVIS ROBERTS & CO.	)	
25 L.P., VESTAR CAPITAL PARTNERS INC.,	)	
26 CENTERVIEW PARTNERS LLC, and	)	
27 PETER J. MOSES,	)	
	)	
28 Defendants.	)	

29 WHEREAS on May 24, 2011, the Court entered a Case Management Order establishing  
 30 a hearing date and briefing schedule for Plaintiff's Motion for Class Certification (ECF No. 49);

31 WHEREAS on August 30, 2011, the Court entered orders establishing a deadline for  
 32 Plaintiff to file the Second Amended Complaint, a briefing schedule for Defendants' Motion(s)  
 33 to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6), and continuing the mediation deadline;

34 STIPULATED ~~PROPOSED~~ ORDER ESTABLISHING DEADLINES, BRIEFING SCHEDULES AND  
 35 HEARING DATES – No. 11-CV-01064-CW

- 1 -

1 WHEREAS the parties now agree to a new deadline for Plaintiff to file the Second  
2 Amended Complaint, briefing schedules for the Motion(s) to Dismiss and Motion for Class  
3 Certification, and mediation deadline;

4 WHEREAS for the purpose of amending the complaint, it is Plaintiff's position that it  
5 needs additional time to review Delaware Litigation discovery produced in this action by  
6 Defendants;

7  
8 WHEREAS pursuant to stipulation by the parties, the Court previously modified the  
9 briefing schedule on Defendants' Motions to Dismiss the First Amended Complaint (ECF No.  
10 75);

11 WHEREAS pending a ruling from the Court on Defendants' anticipated Motion(s) to  
12 Dismiss, the time modification does not presently impact the remaining schedule set out in the  
13 Case Management Order;

14 IT IS HEREBY STIPULATED THAT:

15  
16 1. The deadline for Plaintiff to file the Second Amended Complaint shall now be  
17 October 20, 2011.

18 2. Defendants' Motion(s) to Dismiss shall be due on November 17, 2011; Plaintiff's  
19 opposition brief shall be due on December 8, 2011; and Defendants' reply brief(s) shall be due  
20 on December 22, 2011.

21 3. The hearing date for Defendants' Motion(s) to Dismiss the Second Amended  
22 Complaint shall now be January 5, 2012 at 2 p.m.

23 4. The mediation deadline shall now be February 27, 2012.

24 5. Plaintiff's Motion for Class Certification shall be due on March 8, 2012;  
25 Defendants' opposition brief(s) shall be due on May 3, 2012; and Plaintiff's reply brief shall be  
26 due on May 17, 2012.

1           6.       The hearing date for Plaintiff's Motion for Class Certification shall now be May  
2 31, 2012 at 2 p.m.

3           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

4           DATED: September 15, 2011

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1 DATED: September 15, 2011

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14 DATED: September 15, 2011


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26 *Attorneys for Defendant Vestar Capital Partners Inc.*

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 DATED: 9/16/2011

  
The Hon. Claudia Wilken  
United States District Judge