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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

SHINLI CHI, an individual, on his own behalf
and on behalf of all others similarly situated,

Plaintiffs,

v.

SONY NETWORK ENTERTAINMENT
 AMERICA, INC.; SONY COMPUTER
 ENTERTAINMENT AMERICA LLC; SONY
 NETWORK ENTERTAINMENT
 INTERNATIONAL LLC; SONY COMPUTER
 ENTERTAINMENT AMERICA, INC.; and
 DOES 1-10,

Defendants.

Case No. 3:11-cv-02081-LB

**STIPULATION TO EXTEND
 TIME FOR DEFENDANTS TO
 MOVE, ANSWER, OR
 OTHERWISE RESPOND TO
 COMPLAINT**

Judge: Magistrate Judge Laurel Beeler

1 WHEREAS, defendants Sony Network Entertainment America, Inc., Sony Computer
2 Entertainment America LLC (“SCEA”) (f/k/a Sony Computer Entertainment America, Inc.), and
3 Sony Network Entertainment International LLC (“SNEI”), as well as certain related entities
4 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-one (21)
5 putative class action lawsuits within this District, to date;

6 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
7 least eighteen (18) putative class action lawsuits pending outside this District, to date;

8 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
9 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
10 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
11 2011.

12 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is May
13 25, 2011;

14 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
15 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
16 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
17 JPML;

18 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
19 by and through their respective counsel, hereby stipulate as follows:

20 The deadline for the defendants to respond to the Complaint in the above-captioned action
21 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
22 litigation centralizing the above-captioned action with other matters, or if centralization is denied
23 by the JPML, then 30 days from the date of such order denying centralization.

24 Either party may seek ex parte relief from this stipulated Order for good cause shown,
25 including, but not limited to, Defendants’ filing of a responsive pleading in a related case.

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Dated: May 18, 2011

TINA WOLFSON
ROBERT AHDOOT
AHDOOT & WOLFSON, APC

By: /s/ Robert Ahdoot /s/ [as authorized]
Robert Ahdoot

Attorneys for Plaintiff
SHINLI CHI

Dated: May 18, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

Attorneys for Defendants
SONY NETWORK ENTERTAINMENT
AMERICA, INC.; SONY COMPUTER
ENTERTAINMENT AMERICA LLC;
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: May 20, 2011

By: [Signature]
United States District Court Magistrate Judge

