

1 BORIS FELDMAN, State Bar No. 128838
 Email: boris.feldman@wsgr.com
 2 ELIZABETH C. PETERSON, State Bar No. 194561
 Email: epeterson@wsgr.com
 3 CHERYL FOUNG, State Bar No. 108868
 Email: cfoung@wsgr.com
 4 DIANE M. WALTERS, State Bar No. 148136
 Email: dwalters@wsgr.com
 5 BRYSON S. SANTAGUIDA, State Bar No. 255173
 Email: bsantaguida@wsgr.com
 6 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 7 650 Page Mill Road
 Palo Alto, CA 94304-1050
 8 Telephone: (650) 493-9300
 Facsimile: (650) 565-5100
 9

10 *Attorneys for Defendants Larry Page, Sergey*
Brin, Eric E. Schmidt, L. John Doerr, John L.
 11 *Hennessy, Paul S. Otellini, K. Ram Shriram,*
Shirley M. Tilghman, Nikesh Arora, Patrick
 12 *Pichette, and Nominal Defendant Google Inc.*

13
 14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 OAKLAND DIVISION
 17

18 In re GOOGLE INC. SHAREHOLDER)
 DERIVATIVE LITIGATION)

Master File No. CV-11-04248-PJH

19 _____)
 20 This Document Relates To:)

**STIPULATION AND [PROPOSED]
 ORDER REGARDING BRIEFING
 SCHEDULE FOR DEFENDANTS'
 RESPONSE TO COMPLAINT**

21 ALL ACTIONS)

AS MODIFIED

DATE: N/A

TIME: N/A

JUDGE: Hon. Phyllis J. Hamilton

1 WHEREAS, on October 24, 2011, plaintiffs filed their Verified Consolidated
2 Shareholder Derivative Complaint (the "Complaint");

3 WHEREAS, pursuant to the September 19, 2011 Stipulation and Order Consolidating
4 Actions and Appointing Lead Counsel entered by the Court (Dkt. #15), Defendants have thirty
5 days from the October 24, 2011 filing of the Complaint, or until November 23, 2011, to respond
6 to the Complaint;

7 WHEREAS, due to intervening circumstances, including a death in the immediate family
8 of one of Defendants' attorneys, Defendants have requested, subject to Court approval, that the
9 deadline for Defendants to respond to the Complaint be extended until December 14, 2011, and
10 plaintiffs have agreed to the requested extension;

11 WHEREAS, the parties have further agreed, subject to Court approval, that plaintiffs'
12 opposition to Defendants' motion(s) to dismiss shall be filed no later than January 31, 2012, and
13 Defendants' reply memoranda shall be filed no later than March 1, 2012;

14 WHEREAS, the requested extension is not for the purpose of delay and will not prejudice
15 any party;

16 WHEREAS, the parties have further met and conferred regarding applicable page-length
17 requirements and have agreed that in the event that Defendants file a consolidated motion in
18 response to the Complaint, rather than multiple, individual motions, Defendants shall have the
19 option to file a single, consolidated motion not to exceed 50 pages, in lieu of filing separate 25-
20 page briefs;

21 WHEREAS, in the event that Defendants file a single, consolidated motion in response to
22 the Complaint, Plaintiffs shall have the option of filing a single, consolidated opposition brief of
23 equal length;

24 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
25 undersigned, subject to Court approval, as follows:

- 26 1. Defendants shall have until December 14, 2011 to respond to the Complaint;
- 27 2. Plaintiffs shall have until January 31, 2012 to file their brief(s) in opposition to
28 Defendants' motion(s) to dismiss;

1 3. Defendants shall have until March 1, 2012 to file their reply brief(s);

2 4. Defendants shall have the option to file a single, consolidated motion in response
3 to the Complaint not to exceed ⁴⁰~~50~~ pages, in lieu of filing separate 25-page briefs; and

4 5. In the event that Defendants file a single, consolidated motion, plaintiffs shall
5 have the option of filing a single, consolidated opposition of equal length.

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7 Dated: November 16, 2011

Respectfully submitted,

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WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050

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By: /s/ Elizabeth C. Peterson
Elizabeth C. Peterson

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Attorneys for Defendants and Nominal
Defendant Google Inc.

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15 Dated: November 16, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
DARREN J. ROBBINS
TRAVIS E. DOWNS III
BENNY C. GOODMAN III
ERIK W. LUEDEKE

16

17

18

19

By: /s/ Benny C. Goodman III
Benny C. Goodman III

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21

655 West Broadway, Suite 1900
San Diego, CA 92101-3301
Telephone: 619/231-1058
619/231-7423 (fax)

22

23

24

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

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ROBBINS UMEDA LLP
BRIAN J. ROBBINS
FELIPE J. ARROYO
SHANE P. SANDERS
GINA STASSI
600 B Street, Suite 1900
San Diego, CA 92101
Telephone: 619/525-3990
619/525-3991 (fax)

POMERANTZ HAUDEK GROSSMAN
& GROSS LLP
MARC I. GROSS
JEREMY A. LIEBERMAN
JASON S. COWART
FEI-LU QIAN
100 Park Avenue
New York, NY 10017-5516
Telephone: 212/661-1100
212/661-8665 (fax)

POMERANTZ HAUDEK GROSSMAN
& GROSS LLP
PATRICK V. DAHLSTROM
Ten South La Salle Street, Suite 3505
Chicago, IL 60603
Telephone: 312/377-1181
312/377-1184 (fax)

Lead Counsel for Plaintiffs

I, Elizabeth C. Peterson, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING SCHEDULE FOR DEFENDANTS' RESPONSE TO COMPLAINT. In compliance with General Order 45, X.B., I hereby attest that Benny C. Goodman III has concurred in this filing.

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 11/17/11

