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 7 Credit Suisse International and Credit
 Suisse Securities (USA) LLC
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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

12 CASE NO.: 4:13-cv-02783-SBA

13 MARK LEEVAN, individually and on behalf
 14 of all others similarly situated,

15 Plaintiff,

16 v.

17 CREDIT SUISSE INTERNATIONAL, a
 foreign company; CREDIT SUISSE
 18 SECURITIES (USA) LLC, a Delaware
 limited liability company; and DOES 1-100

19 Defendants.
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**STIPULATION AND ~~PROPOSED~~ ORDER
 EXTENDING TIME TO RESPOND AND
 CONTINUING CASE MANAGEMENT
 CONFERENCE**

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WHEREAS, Plaintiff Mark Leevan filed a Complaint against Defendants Credit Suisse International and Credit Suisse Securities (USA) LLC on June 17, 2013 (the “Action”);

WHEREAS, Defendant Credit Suisse Securities (USA) LLC was served with the summons and complaint on July 17, 2013;

WHEREAS, the undersigned parties anticipate that additional complaints may be filed, and a Lead Plaintiff and Lead Counsel will need to be appointed;

WHEREAS, the case management conference is currently scheduled before this Court on September 18, 2013 at 2:30 PM;

NOW, THEREFORE, in the interest of judicial economy and good cause showing, the parties, by and through their undersigned counsel of record, hereby agree and stipulate, and the Court hereby orders, as follows:

- (1) Defendants need not respond to the complaint filed on June 17, 2013;
- (2) After the appointment of a Lead Plaintiff and Lead Counsel, Defendants and Lead Plaintiff shall meet and confer to determine a schedule for the filing of an amended complaint, and Defendants’ response thereto. The parties will file a stipulated schedule for approval by the Court; and
- (3) The case management conference currently scheduled for September 28, 2013 at 2:30 PM shall be continued until January 16, 2014 at 3:00 PM, with the other dates set by the Order Setting Initial Case Management Conference and ADR Deadlines continued accordingly; and
- (4) No party is waiving any rights, claims, or defenses of any kind except as expressly stated herein.

The parties respectfully request that the Court enter an Order approving this Stipulation.

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IT IS SO STIPULATED.

Respectfully submitted,

Dated: August 22, 2013

LATHAM & WATKINS LLP

By: /s/ Patrick E. Gibbs
Patrick E. Gibbs
Attorneys for Defendants
CREDIT SUISSE
INTERNATIONAL AND CREDIT
SUISSE SECURITIES (USA) LLC

Dated: August 22, 2013


NASSIRI & JUNG LLP

By: /s/ Kassra P. Nassiri
Kassra P. Nassiri
Attorneys for Plaintiff
MARK LEEVAN

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The parties shall meet and confer prior to the conference and shall prepare a joint Case Management Conference Statement which shall be filed no later than seven (7) days prior to the Case Management Conference that complies with the Standing Order For All Judges Of The Northern District Of California and the Standing Order of this Court. Plaintiffs shall be responsible for filing the statement as well as for arranging the conference call. All parties shall be on the line and shall call (510) 637-3559 at the above indicated date and time.

Dated: 9/3/2013


THE HONORABLE
SAUNDRA B. ARMSTRONG
United States District Judge

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ATTESTATION CLAUSE

I, Patrick Gibbs, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Extending Time to Respond and Continuing Case Management Conference pursuant to Civil Local Rule 5-1. I hereby attest that Kassra Nassiri has concurred in this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22 day of August, 2013 at Menlo Park, California.

By: /s/ Patrick E. Gibbs
Patrick E. Gibbs
Attorneys for Defendants
CREDIT SUISSE
INTERNATIONAL AND CREDIT
SUISSE SECURITIES (USA) LLC