

1 Thomas L. Laughlin IV
 Deborah-Clark Weintraub
 2 SCOTT+SCOTT, Attorneys at Law, LLP
 The Chrysler Building
 3 405 Lexington Avenue, 40th Floor
 New York, NY 10174
 4 Tel: (212) 223-6444
 Fax: (212) 223-6334
 5 Email: tlaughlin@scott-scott.com
 dweintraub@scott-scott.com
 6

7 *Counsel for Lead Plaintiffs*

8 [Additional Counsel on Signature Page]

9
 10 UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION
 11

12 WILLARD A. SHARRETTE, DAVID
 13 GOLDMAN, and ESTA GOLDMAN,
 Individually and on Behalf of All Others
 14 Similarly Situated,

15 Plaintiffs,

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

20 Defendants.

Case No. 4:13-cv-02783-SBA

**STIPULATION, DECLARATION, AND
 ORDER TO CONTINUE ORAL
 ARGUMENT AND CASE
 MANAGEMENT CONFERENCE**

Date: July 24, 2014
 Time: 3:00 p.m.
 Judge: Hon. Sandra Brown
 Armstrong
 Courtroom: 1, 4th Floor

1 WHEREAS, pursuant to stipulation of the parties and the Court's Order on December 24,
2 2013 (ECF No. 46), the initial case management conference was continued to July 24, 2014 at
3 3:00 pm;

4 WHEREAS, on February 3, 2014, Lead Plaintiffs filed a Consolidated Amended
5 Complaint (ECF No. 48);

6 WHEREAS, Defendants Credit Suisse International and Credit Suisse Securities (USA)
7 LLC ("Defendants") filed a Motion to Dismiss the Consolidated Amended Complaint ("Motion
8 to Dismiss") on April 4, 2014 (ECF No. 53), and the hearing for the Motion to Dismiss is set for
9 September 9, 2014 (ECF No. 62);

10 WHEREAS, as detailed in the accompanying Declaration of Thomas Laughlin, counsel
11 for Lead Plaintiffs, a conflict has arisen with respect to the September 9, 2014 hearing date for
12 the Motion to Dismiss in that the Ninth Circuit has scheduled oral argument in another case for
13 that date; and

14 WHEREAS, the parties agree that the interests of judicial economy and efficiency would
15 best be served by postponing the case management conference until after the hearing on the
16 Motion to Dismiss;

17 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by all parties through
18 their respective counsel of record, that:

- 19 1. The oral argument in this matter currently scheduled for September 9, 2014 be
20 continued to September 16, 2014, at 1:00 p.m., or another date that is convenient
21 for the Court.
- 22 2. The case management conference in this matter currently scheduled for July 24,
23 2014 be continued to September 24, 2014, at 3:00 pm, or another date that is
24 convenient for the Court and which post-dates oral argument.
- 25 3. All other deadlines set forth in the Court's Order Setting Initial Case Management
26 Conference and ADR Deadlines be continued accordingly.

1 IT IS SO STIPULATED.

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: July 9, 2014

Respectfully submitted,
SCOTT+SCOTT, Attorneys at Law, LLP

By: /s/ Thomas L. Laughlin IV
Thomas L. Laughlin IV
Deborah-Clark Weintraub
SCOTT+SCOTT, Attorneys at Law, LLP
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Tel: (212) 223-6444
Fax: (212) 223-6334
Email: dweintraub@scott-scott.com
tlaughlin@scott-scott.com

Gary V. Mauney
James A. Robert III
LEWIS & ROBERTS, PLLC
One Southpark Center
6060 Piedmont Row Drive South, Suite 140
Charlotte, NC 28287
Tel: (704) 347-8990
Fax: (704) 347-8929
Email: garymauney@lewis-roberts.com
JimRoberts@lewis-roberts.com

Counsel for Lead Plaintiffs

DATE: July 9, 2014

LATHAM & WATKINS LLP

By: /s/ Allison S. Davidson
Allison S. Davidson (267964)
Patrick E. Gibbs (183174)
140 Scott Drive
Menlo Park, California 94025
Tel: (650) 470-4600
Fax: (415) 534-3200
Email: patrick.gibbs@lw.com
allison.davidson@lw.com

Counsel for Credit Suisse International and Credit Suisse Securities (USA) LLC

1 Pursuant to Local Rule 6-2, this Stipulation is supported by the following Declaration of
2 Thomas Laughlin.

3 **DECLARATION OF THOMAS LAUGHLIN**

4 I, Thomas Laughlin, declare:

5 1. I am an attorney at Scott+Scott, Attorneys at Law, LLP, counsel for Plaintiffs in
6 this action. I have the principal responsibility for arguing on behalf of Lead Plaintiffs at oral
7 argument regarding Defendants' Motion to Dismiss. I make this Declaration in support of the
8 parties' stipulation to continue the oral argument and case management conference scheduled in
9 this action.

10 2. The parties have stipulated to these continuances at my request.

11 3. Oral argument in this matter is presently scheduled for September 9, 2014.

12 4. On July 3, 2014, the United States Court of Appeals for the Ninth Circuit
13 scheduled oral argument on September 9, 2014 in *Saginaw Police & Fire Pension v. Andreessen*,
14 No. 12-16473. I am the attorney arguing that appeal. I cannot ask the Ninth Circuit to
15 reschedule that hearing date as I have already done so once, when the oral argument was initially
16 scheduled during a trial pending in the United States District Court for the District of Maine, in
17 *Bankers' Bank Northeast v. Berry Dunn McNeil & Parker*, No. 12-cv-127.

18 I declare, under penalty of perjury, that the foregoing is true and correct. Executed on
19 July 9, 2014 at New York, New York.

20 /s/ Thomas L. Laughlin, IV
Thomas L. Laughlin, IV

21
22 PURSUANT TO THIS STIPULATION IT IS SO ORDERED.

23 DATED: 7/10/2014

24 
25 HON. SANDRA BROWN ARMSTRONG
26 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I hereby certify that on July 9, 2014, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July, 2014 at New York, New York.

/s/ Thomas L. Laughlin IV
Thomas L. Laughlin IV
SCOTT+SCOTT, Attorneys at Law, LLP
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Tel: (212) 223-6444
Fax: (212) 223-6334
tlaughlin@scott-scott.com