

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

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BABAK HATAMIAN and LUSSA DENNJ
SALVATORE, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ADVANCED MICRO DEVICES, INC.,
RORY P. READ, THOMAS J. SEIFERT,
RICHARD A. BERGMAN AND LISA T.
SU,,

Defendants

CASE NO. 4:14-cv-00226-YGR

**[PROPOSED] CASE MANAGEMENT
ORDER**

1 On June 17, 2015, Lead Plaintiffs KBC Asset Management NV and Arkansas Teacher
2 Retirement System, together with Defendants Advanced Micro Devices, Inc.; Rory P. Read;
3 Thomas J. Seifert; Richard A. Bergman; and Dr. Lisa T. Su (collectively, the “Parties”),
4 appeared before the Court for a Case Management Conference. Having considered the Parties’
5 Amended Joint Case Management Conference Statement (Dkt #123) and statements of counsel
6 at the Case Management Conference, the Court orders as follows:

7 **1. CLASS CERTIFICATION**

8 Lead Plaintiffs will move for class certification in accordance with the schedule set forth
9 below. Failure to make class representatives available pursuant to this Order may result in
10 monetary and/or evidentiary sanctions.

11

Event	Date
Class Certification Motion Deadline	September 7, 2015
Deposition of Class Representative(s)	Between September 14 and 25, 2015
Response to Class Certification Motion	October 22, 2015
Class Certification Motion Reply	December 7, 2015

12
13
14

15 As an alternative, the Court may extend the deadline for Defendants’ Response to Lead
16 Plaintiffs’ Class Certification Motion proportionately if the class representatives are not available
17 for deposition by September 25, 2015.

18 **2. SETTLEMENT AND ADR**

19 Defendants and Lead Plaintiffs filed certifications pursuant to ADR Local Rule 3-5(b).
20 (ECF Nos. 91, 96, 97.) The parties agree to conduct private mediation by January 31, 2016.
21 The parties further agree to submit to the Court the name of a mutually agreed mediator by July
22 3, 2015. A compliance hearing regarding the parties’ selection of a mediator shall be held on
23 **Friday, July 10, 2015** on the Court’s 9:01 a.m. calendar, in the Federal Courthouse, 1301 Clay
24 Street, Oakland, California, Courtroom 1.

25 Five (5) business days prior to the date of the compliance hearing, the parties shall file
26 either: (a) statement identifying their selected mediator and the status of their scheduling
27 mediation; or (b) a one-page JOINT STATEMENT setting forth an explanation for their failure to
28

1 comply. If compliance is complete, the parties need not appear and the compliance hearing will
2 be taken off calendar.

3 Telephonic appearances will be allowed if the parties have submitted a joint statement in
4 a timely fashion. Failure to do so may result in sanctions.

5 3. SCHEDULING

6 The parties' proposed schedule and discovery plan is set forth as follows:

7 Event	8 Date
9 Initial Disclosures	May 21, 2015
10 Defendants' Answer	May 14, 2015
11 Initial Written Discovery Served	June 1, 2015
12 Lead Plaintiffs Disclose Identities of Confidential Witnesses	June 24, 2015
13 Initial Document Production Substantially Complete	October 23, 2015
14 Follow Up Written Discovery Served	November 6, 2015
15 Follow Up Production Substantially Complete	February 5, 2015
16 Joinder of Other Parties and Pleading Amendments	February 19, 2016
17 Close of Fact Discovery	June 15, 2016
18 Expert Reports on Issues Where Party Has Burden of Proof	July 6, 2016
19 Responsive Expert Reports	August 11, 2016
20 Rebuttal Expert Reports	September 15, 2016
21 Expert Discovery Cut-off	October 31, 2016
22 Summary Judgment and <i>Daubert</i> Motions	November 17, 2016
23 Summary Judgment and <i>Daubert</i> Oppositions	January 16, 2017
24 Summary Judgment and <i>Daubert</i> Replies	February 16, 2017

25 The AMENDED JOINT CASE MANAGEMENT CONFERENCE STATEMENT is
26 approved as the Case Management Order for this case and all parties shall comply with its
27 provisions.

28 **IT IS SO ORDERED.**

Dated: June 29, 2015


THE HON. YVONNE GONZALEZ ROGERS
United States District Judge

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

ECF ATTESTATION

I, Melanie M. Blunski, am the ECF User whose ID and Password are being used to file this:

JOINT CASE MANAGEMENT CONFERENCE STATEMENT

In compliance with General Order 45, X.B., I hereby attest that William H. Narwold has concurred in this filing.

Executed on the 22nd day of June 2015.

By: /s/ Melanie M. Blunski
Melanie M. Blunski