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10 *Attorneys for Defendants*

11 \*Counsel for Plaintiffs on the following page

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 13  
 14 **UNITED STATES DISTRICT COURT**  
 15 **NORTHERN DISTRICT OF CALIFORNIA**

17 PETER SCHUMAN, an individual, and  
 WILLIAM COPLIN, an individual, on behalf of  
 18 themselves and on behalf of others similarly  
 situated,

19 Plaintiffs,

20 v.

21 MICROCHIP TECHNOLOGY  
 22 INCORPORATED, a corporation; ATMEL  
 CORPORATION, a corporation; and ATMEL  
 23 CORPORATION U.S. SEVERANCE  
 GUARANTEE BENEFIT PROGRAM, an  
 24 employee benefit plan,

25 Defendants

Case No. 4:16-CV-05544-HSG

CLASS ACTION

**STIPULATED REQUEST AND ORDER TO CONSOLIDATE HEARINGS**

**[Civ. L.R. 6-2]**

Hearing Date: August 30, 2018  
 Time: 2:00 p.m.  
 Courtroom: 2, Floor 4  
 Judge: Hon. Haywood S. Gilliam, Jr.

Action Filed: September 29, 2016  
 Trial Date: None Set

1 **PLAINTIFFS' COUNSEL:**

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27 *Attorneys for Plaintiffs*

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1 Plaintiffs Peter Schuman and William Coplin (collectively “*Schuman* Plaintiffs”) filed a  
2 Motion to Dismiss Counterclaims on May 31, 2018. The deadline for Defendants Microchip  
3 Technology Incorporated (“Microchip”), Atmel Corporation (“Atmel”) and Atmel Corporation  
4 U.S. Severance Guarantee Benefit Program (“Severance Program” and, collectively with  
5 Microchip and Atmel, “Defendants”) to respond to that motion is July 16, 2018. Plaintiffs’ reply in  
6 support of the motion is due on July 23, 2018. A hearing on the Motion to Dismiss Counterclaims  
7 is currently scheduled for August 30, 2018 at 2:00 p.m.

8 In the related case of *Berman et al. v. Microchip Technology Incorporated et al.*, 4:17-cv-  
9 01864-HSG, Plaintiffs Robin Berman, Bo Kang, Khashayar Mirfakhraei, Thang Van Vu, Donna  
10 Viera-Castillo, Girish Ramesh, Patrick Hanley, Ilana Shternshain and Mandy Schwarz filed a  
11 Motion for Partial Summary Judgment on July 2, 2018 and noticed the hearing for September 13,  
12 2018 at 2:00 p.m. Plaintiffs in the *Berman* action are represented by the same attorneys who  
13 represent the *Schuman* Plaintiffs. Defendants are the same in both actions.

14 In the interest of efficiency, the *Schuman* Plaintiffs and Defendants, by and through their  
15 respective attorneys of record, request the Court consolidate the hearing on the Motion to Dismiss  
16 Counterclaims filed in the *Schuman* case with the hearing on the Motion for Partial Summary  
17 Judgment filed in the *Berman* case and hold a hearing on both motions on September 13, 2018 at  
18 2:00 p.m.

19 Respectfully submitted July 13, 2018.

20 OGLETREE, DEAKINS, NASH, SMOAK &  
21 STEWART, P.C.

22 By: /s/ Mark G. Kisicki  
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Attorneys for Plaintiffs

**SIGNATURE ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document, and that this attestation was executed on July 13, 2018.

By: /s/ Mark G. Kisicki

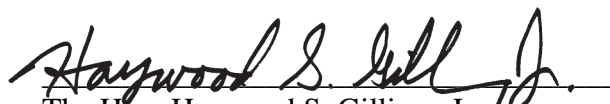
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**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The hearing on the Motion to Dismiss Counterclaims in *Schuman et al. v. Microchip Technology Incorporated et al.*, 4:16-CV-05544-HSG shall be consolidated with the hearing on the Motion for Partial Summary Judgment in *Berman et al. v. Microchip Technology Incorporated et al.*, 4:17-cv-01864-HSG. A consolidated hearing on both motions shall take place on September 13, 2018 beginning at 2:00 p.m.

Dated: 7/16/2018

  
The Hon. Haywood S. Gilliam, Jr.  
United States District Judge