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13	Attorneys for Plaintiffs			
14				
15	UNITED STATES DISTRICT COURT			
16	NORTHERN DISTRICT OF CALIFORNIA			
17	DODIN DEDMAN DO KANC	Com No. 5.17 CV 01964 USC		
18	ROBIN BERMAN, BO KANG, KHASHAYAR MIRFAKHRAEI, THANG	Case No. 5:17-CV-01864-HSG		
19 20	VAN VU, DONNA VIERA-CASTILLO, GIRISH RAMESH, PATRICK HANLEY, ILANA SHTERNSHAIN and MANDY SCHWARZ,	STIPULATION AND ORDER ENLARGING PLAINTIFFS' TIME TO RESPOND TO DEFENDANTS' MOTION TO DISMISS		
21	Plaintiffs,	[Civ. L.R. 6-2]		
22	V.	Hearing Date: June 22, 2017		
23	MICROCHIP TECHNOLOGY	Time: 2:00 p.m. Ctrm.: 2, Floor 4		
24	INCORPORATED, a corporation; ATMEL CORPORATION, a corporation; and ATMEL	Judge: Hon. Haywood S. Gilliam, Jr.		
24 25	CORPORATION U.S. ŜEVERANCE	Action Filed: September 29, 2016		
	GUARANTEE BENEFIT PROGRAM, an employee benefit plan,	Trial Date: Not yet set		
26	Defendants			
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28				
	STIPULATION ENLARGING PLS.' TIME TO RESPOND TO MOTION TO DISMISS, #5:17-CV-01864-HSG Dockets.Justia c			

Plaintiffs Robin Berman, Bo Kang, Khashayar Mirfakhraei, Thang Van Vu, Donna Viera-1 Castillo, Girish Ramesh, Patrick Hanley, Ilana Shternshain and Mandy Schwarz (collectively 2 3 "Plaintiffs") and Defendants Microchip Technology, Inc., Atmel Corporation, and Atmel Corporation U.S. Severance Guarantee Benefit Program (collectively "Defendants"), herein referred 4 5 to collectively as the "Parties," hereby stipulate, by and through their respective attorneys of record, as follows: 6 7 WHEREAS, Defendants filed a motion to dismiss Plaintiffs' complaint on April 28, 2017 (Dkt. 9); 8

WHEREAS, on April 28, 2017, Defendants also filed a motion to dismiss the complaint in
the related case *Schuman, et al. v. Microchip Technology, Inc., et al.*, Case No. 4:16-CV-05544-HSG
(N.D. Cal.), in which the plaintiffs are represented by the same counsel representing Plaintiffs in this
matter;

WHEREAS, pursuant to Civil Local Rule 7-3(a), Plaintiffs' oppositions to Defendants'
motions to dismiss in both cases are currently due May 12, 2017;

WHEREAS, Defendants agree to extend the deadline for Plaintiffs to respond to both
motions to dismiss to and including May 31, 2017; and

WHEREAS, the stipulated extension of time for Plaintiffs to respond to Defendants' motions
to dismiss will not affect any other dates or deadlines in this case;

THEREFORE, THE PARTIES HEREBY STIPULATE that Plaintiffs' time to respond to
Defendants' motion to dismiss (Dkt. 9) is extended up to and including May 31, 2017. The hearing
on the motion will remain set for June 22, 2017 at 2:00 p.m., or as soon thereafter as this Court is
available.

Respectfully submitted.

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24	Dated: May 8, 2017	/ <u>s/Michael Rubin</u> Michael Rubin
25		ALTSHULER BERZON LLP
26		Michael Rubin Connie K. Chan
27		Raphael N. Rajendra Altshuler Berzon LLP
28		177 Post Street, Suite 300
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STIPULATION ENLARGING PLS.' TIME TO RESPOND TO MOTION TO DISMISS, #5:17-CV-01864-HSG

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5 6	Telephone: (415) 421-9292 Facsimile: (415) 403-0202
7	Attom out for Digitiffs and the Drop and Class
8	Attorneys for Plaintiffs and the Proposed Class
9	Dated: May 8, 2017 /s/Mark G. Kisicki
10	Mark G. Kisicki (E-signature authorized on May 8, 2017)
11	OGLETREE, DEAKINS, NASH, SMOAK &
12	STEWART, P.C. Mark G. Kisicki (CA SBN 150057)
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18	Fax: 219.242.8669
19	Attorneys for Defendants
20	
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.
22	$\rho = \rho = \rho = \rho$
23	Dated: May 19, 2017 Haywood S. Gilliam, Jr. 7
24	United States District Judge
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	2 STIPULATION ENLARGING PLS.' TIME TO RESPOND TO MOTION TO DISMISS, #5:17-CV-01864-HSG

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DECLARATION OF MICHAEL RUBIN IN SUPPORT OF STIPULATION

I, Michael Rubin, declare as follows:

I am a member in good standing of the bar of the State of California and am one of 3 1. the counsel of record for Plaintiffs Robin Berman, Bo Kang, Khashayar Mirfakhraei, Thang Van Vu, 4 5 Donna Viera-Castillo, Girish Ramesh, Patrick Hanley, Ilana Shternshain and Mandy Schwarz (collectively "Plaintiffs") in the above-captioned case. I am also one of the counsel of record for 6 7 Plaintiffs Peter Schuman and William Coplin in the related case Schuman, et al. v. Microchip Technology, Inc., et al., Case No. 4:16-CV-05544-HSG (N.D. Cal.). I make this declaration in 8 9 support of the Parties' stipulated request to enlarge the time for Plaintiffs to respond to Defendants' motion to dismiss. The facts set forth in this declaration I know to be true of my own personal 10 knowledge, except where stated to be based on information and belief. 11

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2. On April 28, 2017, Defendants filed a motion to dismiss Plaintiffs' complaint in this action. Dkt. 9. That same day, Defendants also filed a motion to dismiss the complaint in *Schuman*.

Pursuant to Civil Local Rule 7-3(a), Plaintiffs' oppositions to Defendants' motions to
 dismiss in both cases are currently due May 12, 2017. Due to preexisting work obligations,
 Plaintiffs' counsel are unable to file both oppositions by May 12, 2017.

4. I conferred with counsel for Defendants, and Defendants agree to extend the deadline
for Plaintiffs to respond to both motions to dismiss to and including May 31, 2017.

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5. There have been no previous time modifications in this case.

20 6. To the best of my knowledge, the requested time modification will have no effect on
21 the schedule for the case.

I declare under penalty of perjury that the foregoing is true and correct to the best of my
knowledge. Executed at San Francisco, California, on May 8, 2017.

/s/ Michael Rubin Michael Rubin