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13 *Attorneys for Plaintiffs*

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

17 ROBIN BERMAN, BO KANG,  
 18 KHASHAYAR MIRFAKHRAEI, THANG  
 VAN VU, DONNA VIERA-CASTILLO,  
 19 GIRISH RAMESH, PATRICK HANLEY,  
 ILANA SHTERNSHAIN and MANDY  
 20 SCHWARZ,

21 Plaintiffs,

22 v.

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

26 Defendants

Case No. 5:17-CV-01864-HSG

**STIPULATION AND ORDER ENLARGING  
 PLAINTIFFS' TIME TO RESPOND TO  
 DEFENDANTS' MOTION TO DISMISS**

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

Hearing Date: June 22, 2017  
 Time: 2:00 p.m.  
 Ctrm.: 2, Floor 4  
 Judge: Hon. Haywood S. Gilliam, Jr.

Action Filed: September 29, 2016  
 Trial Date: Not yet set

1 Plaintiffs Robin Berman, Bo Kang, Khashayar Mirfakhraei, Thang Van Vu, Donna Viera-  
2 Castillo, Girish Ramesh, Patrick Hanley, Ilana Shternshain and Mandy Schwarz (collectively  
3 “Plaintiffs”) and Defendants Microchip Technology, Inc., Atmel Corporation, and Atmel  
4 Corporation U.S. Severance Guarantee Benefit Program (collectively “Defendants”), herein referred  
5 to collectively as the “Parties,” hereby stipulate, by and through their respective attorneys of record,  
6 as follows:

7 WHEREAS, Defendants filed a motion to dismiss Plaintiffs’ complaint on April 28, 2017  
8 (Dkt. 9);

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

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

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

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

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

23 Respectfully submitted,

24 Dated: May 8, 2017

/s/Michael Rubin  
Michael Rubin

25 ALTSHULER BERZON LLP  
26 Michael Rubin  
27 Connie K. Chan  
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*Attorneys for Plaintiffs and the Proposed Class*

Dated: May 8, 2017

/s/Mark G. Kisicki  
Mark G. Kisicki  
(E-signature authorized on May 8, 2017)


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*Attorneys for Defendants*

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

Dated: May 19, 2017

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

