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[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE RECKSTIN FAMILY TRUST, et al.,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

C3.AI, INC., et al.,

Defendants.

No. 4:22-cv-01413-HSG

CLASS ACTION

**STIPULATION AND ORDER TO
CONTINUE HEARING ON MOTIONS
TO DISMISS**

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-7, Lead Plaintiff Mark Samarghandi (“Lead
2 Plaintiff”), and Defendants C3, Inc. (“C3”), Thomas M. Siebel, Edward Y. Abbo, David Barter, and
3 Lorenzo Simonelli (together, the “C3 Defendants”), and Baker Hughes Company (“Baker Hughes”
4 and, together with the C3 Defendants, the “Defendants”), hereby agree and stipulate, through their
5 respective counsel of record, that good cause exists to request an order from the Court continuing the
6 hearing on Defendants’ Motions to Dismiss, as follows:

7 WHEREAS, on January 10, 2023, the Court entered a stipulation and order setting deadlines
8 for Plaintiffs’ Amended Class Action Complaint, Defendants’ motions to dismiss, Plaintiffs’
9 opposition thereto, and Defendants’ replies (ECF No. 68);

10 WHEREAS, on February 15, 2023, Lead Plaintiff Mark Samarghandi filed an Amended Class
11 Action Complaint (ECF No. 71) alleging violations of the Securities Act of 1933 and the Securities
12 Exchange Act of 1934 against corporate defendants C3, Inc. and Baker Hughes Company, and
13 individual defendants Thomas M. Siebel, Edward Y. Abbo, David Barter, and Lorenzo Simonelli; and
14 violations of the Securities Act of 1933 against underwriter defendants Morgan Stanley & Co. LLC,
15 J.P. Morgan Securities LLC, BofA Securities, Inc., Deutsche Bank Securities, Inc., Canaccord Genuity
16 LLC, JMP Securities LLC, KeyBanc Capital Markets Inc., Needham & Company, LLC, Piper Sandler
17 & Co., and Wedbush Securities Inc. (the “Underwriter Defendants”).

18 WHEREAS, on April 11, 2023, the Court entered a stipulation and order extending time for
19 Defendants’ motions to dismiss, Plaintiffs’ opposition thereto, and Defendants’ replies (ECF No. 100);

20 WHEREAS, on May 1, 2023, the C3 Defendants, Baker Hughes, and the Underwriter
21 Defendants filed motions to dismiss the Amended Class Action Complaint. *See* ECF Nos. 105, 109,
22 113;

23 WHEREAS, on June 30, 2023, Plaintiffs and the Underwriter Defendants filed a Stipulation of
24 Voluntary Dismissal with Prejudice dismissing their claims against the Underwriter Defendants (ECF
25 No. 118);

26 WHEREAS, on June 30, 2023, Plaintiffs filed an omnibus opposition responding to the C3
27 Defendants’ and Baker Hughes’ Motions to Dismiss (ECF No. 119);

1 WHEREAS, a hearing on Defendants' motions to dismiss was originally noted for August 17,
2 2023, at 2:00 p.m. (see ECF Nos. 105, 109, 113);

3 WHEREAS, pursuant to the Clerk's Notice, the hearing on Defendants' motions to dismiss
4 was continued to August 24, 2023, at 2:00 p.m. (ECF No. 126);

5 WHEREAS, counsel for Plaintiffs are unavailable to attend the hearing on the continued date
6 due to a longstanding work-related commitment taking place out-of-state between August 23 and
7 August 25, 2023;

8 WHEREAS, all parties consent to the requested relief;

9 IT IS ACCORDINGLY STIPULATED AND AGREED, by and between the undersigned
10 counsel for the parties, subject to Court approval, that:

11 1. The hearing on Defendants' Motions to Dismiss is hereby continued to November 2,
12 2023.

13 IT IS SO STIPULATED.

14 DATED: August 8, 2023

Respectfully submitted,

15 /s/ Reed R. Kathrein

16 Reed R. Kathrein (SBN 139304)

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12 *Counsel for Additional Plaintiffs Sharon L. Zavalanski,*
13 *David Linder, and Elizabeth Wensel*

14 DATED: August 8, 2023

15 Respectfully submitted,

16 /s/ Harry A. Olivar, Jr.

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Counsel for Defendants C3, Inc., Thomas M. Siebel,
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1 DATED: August 8, 2023

Respectfully submitted,

2 /s/ Jessica Valenzuela

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