

1 Harry A. Olivar, Jr. (SBN 143089)
 2 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**
 3 865 S. Figueroa Street, 10th Floor
 4 Los Angeles, CA 90017
 (213) 443-3000
 harryolivar@quinnemanuel.com

5 *Counsel for Defendants C3.ai, Inc., Thomas M. Siebel,*
 6 *Edward Y. Abbo, and David Barter*

7 [Additional counsel on signature page]

8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

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

Plaintiff,

vs.

C3.AI, INC., et al.,

Defendants.

Case No. 4:22-cv-01413-HSG

CLASS ACTION

**STIPULATION AND ORDER
 REGARDING HEARING AND
 BRIEFING SCHEDULE FOR
 PLAINTIFF'S MOTION FOR
 LEAVE TO AMEND**

1 Lead Plaintiff Mark Samarghandi (“Lead Plaintiff”) and Defendants C3.ai, Inc. (“C3”)
2 Thomas M. Siebel, Edward Y. Abbo, David Barter, Lorenzo Simonelli, and Baker Hughes Company
3 (together, the “Defendants,” and with Lead Plaintiff, the “Parties”) hereby stipulate, through their
4 respective counsel of record, subject to approval of the Court, as follows:

5 WHEREAS, on September 5, 2024, the Parties entered into a stipulation setting forth the
6 briefing schedule for Lead Plaintiff’s anticipated motion for leave to file a Third Amended
7 Complaint (ECF No. 179), which was so-ordered by the Court on September 9, 2024 (ECF No. 180);

8 WHEREAS, on September 27, 2024, Lead Plaintiff filed a motion for leave to file a Third
9 Amended Complaint (ECF No. 181, the “Motion for Leave to Amend”);

10 WHEREAS, pursuant to the Parties’ stipulation, Defendants’ oppositions to Lead Plaintiff’s
11 Motion for Leave to Amend are currently due on October 28, 2024, and Lead Plaintiff’s reply in
12 support of the Motion for Leave to Amend is currently due on November 18, 2024;

13 WHEREAS, a hearing on Lead Plaintiff’s Motion for Leave to Amend was noticed for
14 December 5, 2024 (ECF No. 181);

15 WHEREAS, to permit counsel for all Defendants to coordinate with each other in preparing
16 the oppositions, all Defendants respectfully request that their time to file their oppositions to the
17 Moton for Leave to Amend be extended by 15 days from the current deadline of October 28, 2024
18 until November 12, 2024;

19 WHEREAS, Plaintiffs do not oppose the requested relief;

20 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel
21 for the Parties, subject to approval of the Court, that:

- 22 1. The hearing on Lead Plaintiff’s Motion for Leave to Amend is hereby continued to
23 January 23, 2025.
- 24 2. Defendants shall file any oppositions to Lead Plaintiff’s motion to file a Third
25 Amended Complaint no later than November 12, 2024.
- 26 3. Lead Plaintiff shall file his reply in support of his motion for leave to file a Third
27 Amended Complaint no later than December 10, 2024.
- 28 4. This schedule may be modified by agreement of the Parties, as approved by the

1 Court.

2 DATED: October 25, 2024

Respectfully submitted,

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QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By: /s/ Harry A. Olivar, Jr.

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Harry A. Olivar, Jr. (SBN 143089)
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000
harryoliviar@quinnemanuel.com

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9

10

David Edward Myre, III (SBN 304600)
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, CA 94065
(650) 801-5000
davidmyre@quinnemanuel.com

11

12

13

14

Michael B. Carlinsky (*pro hac vice*)
Jesse A. Bernstein (*pro hac vice*)
Jacob J. Waldman (*pro hac vice*)
Leigha Empson (*pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7173
michaelcarlinsky@quinnemanuel.com
jessebernstein@quinnemanuel.com
jacobwaldman@quinnemanuel.com
leighaempson@quinnemanuel.com

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*Counsel for Defendants C3.ai, Inc., Thomas M.
Siebel, Edward Y. Abbo, and David Barter*

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DATED: October 25, 2024

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Jessica Valenzuela
Jessica Valenzuela (SBN 220934)
310 University Avenue
Palo Alto, CA 94301
Telephone: (650) 849-5300
Facsimile: (650) 849-5333
JValenzuela@gibsondunn.com

George B. Adams (SBN 321904)
One Embarcadero Center Suite 2600
San Francisco, CA 94111-3715
Telephone: (415) 393-8200
Facsimile: (415) 393-8306
GAdams@gibsondunn.com

Counsel for Defendant Baker Hughes Company

DATED: October 25, 2024

SIDLEY AUSTIN LLP

By: /s/ Sara B. Brody
Sara B. Brody (SBN 130222)
Sarah A. Hemmendinger (SBN 298659)
555 California Street, Suite 2000
San Francisco, CA 94104
Telephone: (415) 772-1200
sbrody@sidley.com
shemmendinger@sidley.com

Robin E. Wechkin (*pro hac vice*)
8426 316th Place Southeast
Issaquah, WA 98027
Telephone: (415) 439-1799
rwechkin@sidley.com

Counsel for Defendant Lorenzo Simonelli

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DATED: October 25, 2024

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Reed R. Kathrein
Reed R. Kathrein (SBN 139304)
Lucas E. Gilmore (SBN 250893)
715 Hearst Ave., Suite 202
Berkeley, CA 94710
(510) 725-3000
reed@hbsslaw.com
lucasg@hbsslaw.com

Steve W. Berman (*pro hac vice*)
Catherine Y.N. Gannon (*pro hac vice*)
1301 Second Avenue, Suite 2000
Seattle, WA 98101
(206) 623-7292
steve@hbsslaw.com
catherineg@hbsslaw.com

Lead Counsel and Counsel for Lead Plaintiff Mark Samarghandi

DATED: October 25, 2024

THE ROSEN LAW FIRM, P.A

By: /s/ Laurence M. Rosen
Laurence M. Rosen (SBN 219683)
355 S. Grand Avenue, Suite 2450
Los Angeles, CA 90071
(213) 785-2610
lrosen@rosenlegal.com

Jonathan Stern (*pro hac vice*)
275 Madison Ave., 40th Floor
New York, NY 10016
(212) 686-1060
jstern@rosenlegal.com

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

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Attestation Pursuant to Civil Local Rule 5-1(h)(3)

Pursuant to Local Rule 5-1(h)(3), I hereby attest that all other signatories listed, and on whose behalf this filing is jointly submitted, concur in this filing's content and have authorized me to file this document.

Dated: October 25, 2024

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Harry A. Olivar
Harry A. Olivar

Counsel for Defendants C3.ai, Inc., Thomas M. Siebel, Edward Y. Abbo, and David Barter

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Dated: 10/28/2024


HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE