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 13 APPLE INC.

14 (additional counsel listed on signature page)

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

18 IN RE APPLE INC. SECURITIES
 19 LITIGATION

Case No. C06-05208-JF
CLASS ACTION

20 THIS DOCUMENT RELATES TO:
 21 ALL ACTIONS

**STIPULATION AND [PROPOSED]
 ORDER REGARDING SCHEDULING
 MATTERS**

Judge: The Honorable Jeremy Fogel

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1 WHEREAS, on August 24, 2006, plaintiffs Vogel and Mahoney filed a class action
2 complaint in this Court alleging that certain defendants violated the Securities Exchange Act of
3 1934 (the “Exchange Act”), including § 10(b) and Rule 10b-5 thereunder, and § 20(a)
4 (“*Vogel I*”);

5 WHEREAS, on June 27, 2008, plaintiffs Vogel and Mahoney filed a new class action
6 complaint in this Court alleging that certain defendants violated the Exchange Act, including
7 § 10(b) and Rule 10b-5 thereunder, and § 20(a) (“*Vogel II*”);

8 WHEREAS, on April 8, 2010, this Court entered an order consolidating *Vogel I* and
9 *Vogel II*, extending defendants’ time to respond to the complaint to June 25, 2010, and setting a
10 briefing schedule in the event that defendants respond to the complaint by filing motions;

11 WHEREAS, on May 14, 2010, plaintiffs filed a [Corrected] First Amended Consolidated
12 Class Action Complaint (“Complaint”);

13 WHEREAS, the parties have met and conferred and wish to extend defendants’ time to
14 respond to the Complaint and modify the briefing schedule in the event that defendants respond to
15 the Complaint by filing motions;

16 NOW, THEREFORE, the undersigned parties hereby stipulate and agree, and respectfully
17 request that the Court enter an order as follows:

18 1. Defendants shall file their responses to the Complaint by September 3, 2010.

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1 2. In the event that defendants respond to the Complaint by filing motions, the
2 briefing and hearing schedule for defendants' motions will be:

3	Plaintiffs' Oppositions Due:	October 8, 2010
4	Defendants' Replies Due:	October 29, 2010
5	Hearing:	To be set by the Court.

6 IT IS SO STIPULATED

7	Dated: July 27, 2010	GEORGE A. RILEY O'MELVENY & MYERS LLP
8		

9	By: _____	/s/ George A. Riley
10		George A. Riley

11		Attorneys for Defendant APPLE INC.
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12		
13	Dated: July 27, 2010	DOUGLAS R. YOUNG (S.B. #73248) FARELLA BRAUN & MARTEL LLP Russ Building 235 Montgomery Street, 17th floor San Francisco, CA 94104 Telephone: (415) 954-4400 Facsimile: (415) 954-4480 E-Mail: dyoung@fbm.com

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18	By: _____	/s/ Douglas R. Young
19		Douglas R. Young

20		Attorneys for Defendants
21		STEVEN P. JOBS, WILLIAM V. CAMPBELL, MILLARD S. DREXLER, ARTHUR D. LEVINSON and JEROME B. YORK
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1 Dated: July 27, 2010

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1 I, George A. Riley, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Scheduling Matters. In compliance with General
3 Order 45, X.B., I hereby attest that Douglas R. Young, Yohance C. Edwards and Michael J. Barry
4 have concurred in this filing.


5 By: /s/ George A. Riley
6 George A. Riley

7 **ORDER**

8 PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

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10 DATED: July 29, 2010

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The Honorable Jeremy Fogel
United States District Judge