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 8 **UNITED STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**
 10 **SAN JOSE DIVISION**

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 12 IN RE GOOGLE ADWORDS LITIGATION
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 16 This Document Relates to:
 17 All Actions
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Case No. 08-3369 JW

**STIPULATION AND [PROPOSED]
 ORDER CONSOLIDATING OLABODE V.
 GOOGLE, INC., NO. 09-3414 JW INTO IN
 RE GOOGLE ADWORDS LITIGATION,
 NO. 08-3369 JW**

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1 WHEREAS, by order dated February 25, 2009 the Court consolidated four related class
2 actions under the foregoing caption, and appointed the law firm of Schubert Jonckheer Kolbe &
3 Kralowec LLP as interim lead counsel (Docket #40);

4 WHEREAS, by order dated February 25, 2009, the Court bifurcated discovery into class
5 and merits discovery, and issued a scheduling order for Class Discovery, including the plaintiffs'
6 motion for class certification (Docket #41);

7 WHEREAS, on April 24, 2009, plaintiffs filed the Consolidated Class Action Complaint in
8 this matter (Docket #45);

9 WHEREAS, on May 18, 2009, defendant Google, Inc. ("Google") filed the answer to the
10 Consolidated Class Action Complaint;

11 WHEREAS, on July 27, 2009, the action Olabode v. Google Inc., No. 09-3414 JW was
12 filed in this Court, which action is based on the same alleged facts and circumstances concerning
13 Google's AdWords program at issue in the consolidated action;

14 WHEREAS, on August 21, 2009, the Court issued an order relating Olabode to the
15 consolidated action;

16 WHEREAS, on September 17, 2009, following a case management conference, the Court
17 issued a further scheduling order (1) setting a Class Discovery cutoff of May 24, 2010 and a
18 hearing date for plaintiffs' motion for class certification on September 20, 2010; and (2) directing
19 the parties to stipulate to consolidation of the Olabode action (Docket #65);

20 WHEREAS, the parties agree that, pursuant to Federal Rule of Civil Procedure Rule 21,
21 plaintiff Olabode should be added to the consolidated action as party plaintiff, such that service of
22 the Olabode complaint is unnecessary;

23 THEREFORE, the parties hereby stipulate, and request the Court to order, as follows:

24 1. The action Olabode v. Google, Inc., No. 09-3414 JW is hereby consolidated into In
25 re Google AdWords Litigation, No. 08-3369 JW.

26 2. Pursuant to Federal Rule of Civil Procedure Rule 21, plaintiff Olabode is added to
27 the consolidated action as a party plaintiff.

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