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APPLE INC., a California Corporation
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 In Re: iPhone/iPad Application Consumer
14 Privacy Litigation
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Case No. 5:11-md-02250-LHK

**JOINT STIPULATION
REGARDING BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTIONS TO DISMISS**

1 WHEREAS, on September 20, 2011, the Court granted Defendants' motions to dismiss
2 Plaintiffs' Consolidated Class Action Complaint for lack of Article III standing, with leave to
3 amend. (Dkt No. 8).

4 WHEREAS, on October 5, 2011, following a case management conference on that same
5 date, the Court issued a minute order directing Plaintiffs to file their First Amended Consolidated
6 Complaint by November 21, 2011, and requiring the parties to file a stipulation regarding the
7 briefing schedule for "Defendants' anticipated motion to dismiss." (Dkt. No. 21).

8 WHEREAS, on November 21, 2011, Plaintiffs filed a First Amended Consolidated Class
9 Action Complaint (Dkt. No. 25) and, on November 22, 2011, Plaintiffs filed a substantively
10 identical corrected version of the same ("First Amended Consolidated Complaint") (Dkt. No. 26).

11 WHEREAS, the First Amended Consolidated Complaint adds several new causes of
12 action, removes several causes of action, and adds two new party defendants: Google, Inc.
13 ("Google") and Medialets, Inc. ("Medialets").

14 WHEREAS, on December 1, 2011, the Court issued summonses for Google and
15 Medialets.

16 WHEREAS, Plaintiffs seek to serve Google and Medialets as soon as practicable.

17 WHEREAS, as with the last round of dispositive briefing in this case, the Defendants (at
18 least, those who have been served and made a first appearance) intend to try and coordinate the
19 filing of consolidated motions to dismiss rather than separate motions, for the convenience of the
20 Court and all parties.

21 WHEREAS, Defendants need sufficient time to coordinate and exchange motion drafts,
22 including with any new parties that might be served, and believe that the proposed schedule will
23 provide adequate time to so coordinate amongst existing and new Defendants.

24 THEREFORE, pursuant to the Court's October 5, 2011 Order, and subject to the approval
25 of the Court, the parties, through their undersigned counsel, hereby stipulate and agree that:

26 1. Defendants' Motions to Dismiss shall be filed and served not later than
27 January 10, 2012.

28 2. Plaintiffs' Oppositions shall be filed and served not later than February 15, 2012.

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3. Defendants' Replies shall be filed and served not later than March 2, 2012.
Defendants shall secure from the Court a date for hearing at the time the motion is filed.

1 Dated: December 1, 2011

MORRISON & FOERSTER LLP

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3 By: /s/ James F. McCabe

4 James F. McCabe

5 Attorneys for Defendant
APPLE INC., a California corporation

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7 Dated: December 1, 2011

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1 Dated: December 1, 2011

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28 EXECUTIVE COMMITTEE FOR
CONSOLIDATED PLAINTIFFS

19 GENERAL ATTESTATION

20 I, James F. McCabe, am the ECF User whose ID and password are being used to file this
21 JOINT CASE MANAGEMENT STATEMENT. In compliance with General Order 45, X.B., I
22 hereby attest that all persons signing this stipulation have concurred in this filing.

23 Date: December 1, 2011

/s/ James F. McCabe
James F. McCabe

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2 DATED: December 5, 2011

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The Honorable Lucy H. Koh
United States District Court Judge