

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Kathleen M. Sullivan (CA Bar No. 242261)

2 kathleensullivan@quinnemanuel.com

3 555 Twin Dolphin Drive, 5th Floor

Redwood City, California 94065

4 Telephone: (650) 801-5000

Facsimile: (650) 801-5100

5 Faith E. Gay (*pro hac vice*)

6 faithgay@quinnemanuel.com

7 Isaac Nesser (*pro hac vice*)

isaacnesser@quinnemanuel.com

8 51 Madison Avenue, 22nd Floor

New York, New York 10010

9 Telephone: (212) 849-7000

Facsimile: (212) 849-7100

10 Attorneys for Defendants Cisco Systems, Inc.,

11 John Chambers, Thomas Lam, and Owen Chan

12  
13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN JOSE DIVISION

16  
17  
18 Doe I, Doe II, Ivy He, Doe III, Doe IV, Doe V,  
19 Doe VI, ROE VII, Charles Lee, Roe VIII, Liu  
Guifu, and those individuals similarly situated,

20 Plaintiffs,

21 v.

22 Cisco Systems, Inc., John Chambers, Thomas  
23 Lam, Owen Chan, and Does 1-100,

24 Defendants.

Case No. 5:11-cv-02449-JF-PSG

**STIPULATION AND [PROPOSED]  
ORDER TO EXCEED APPLICABLE  
PAGE LIMIT**

1           **WHEREAS**, Defendants’ Motion to Dismiss the Complaint is scheduled to be filed on  
2 August 4, 2011;

3           **WHEREAS**, Plaintiffs’ Class Action Complaint is 52 pages long and asserts fourteen  
4 causes of action;

5           **WHEREAS**, the Plaintiffs and Defendants agree that the applicable 25-page limit for  
6 briefs in support of and in opposition to Defendants’ forthcoming Motion to Dismiss the  
7 Complaint is insufficient to address the claims and issues raised in the Complaint; and

8           **WHEREAS**, the Plaintiffs and Defendants further agree that the applicable 15-page limit  
9 for Defendants’ reply brief in support of their forthcoming Motion to Dismiss the Complaint is  
10 insufficient to address the claims and issues raised in the Complaint; and

11           **WHEREAS**, the Plaintiffs and Defendants further agree that extending the page limit will  
12 allow the parties to address adequately each claim and issue, and assist the Court in efficiently and  
13 effectively resolving Defendants’ forthcoming Motion to Dismiss the Complaint;

14           **NOW, THEREFORE**, the Parties stipulate as follows:

15           1.       Defendants’ opening brief in support of their Motion to Dismiss the Complaint, and  
16 Plaintiffs’ brief in opposition that Motion, may each be a maximum of 50 pages of text, excluding  
17 tables of contents, tables of authorities, and supporting documents.

18           2.       Defendants’ reply brief in further support of their Motion to Dismiss the Complaint  
19 may be a maximum of 20 pages of text, excluding tables of contents, tables of authorities, and  
20 supporting documents.

21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 22, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Kathleen M. Sullivan  
\_\_\_\_\_  
Kathleen M. Sullivan  
kathleensullivan@quinnemanuel.com  
Faith E. Gay  
faithgay@quinnemanuel.com  
Isaac Nesser  
isaacnesser@quinnemanuel.com

Attorneys for Defendants

SCHWARCZ RIMBERG BOYD & RADER, LLP

By /s/ K. Kee Boyd  
\_\_\_\_\_  
K. Kee Boyd\*  
lboyd@srbr-law.com

Attorneys for Plaintiffs

HUMAN RIGHTS LAW FOUNDATION

By /s/ Terri M. Marsh  
\_\_\_\_\_  
Terri M. Marsh\*  
terri.marsh@hrhf.net

Attorneys for Plaintiffs

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2011

\_\_\_\_\_  
Hon. Jeremy Fogel

\_\_\_\_\_

\* I have obtained signatory's consent to file this stipulation and proposed order.