

NOTING DATE: January 3, 2025

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

KATHERINE KING, derivatively on behalf of
STARBUCKS CORPORATION,

Case No. 2:24-cv-01720-JHC

Plaintiff,

v.

**STIPULATION AND ORDER
CONSOLIDATING RELATED
SHAREHOLDER DERIVATIVE
ACTIONS AND APPOINTING
CO-LEAD COUNSEL FOR PLAINTIFFS**

LAXMAN NARASIMHAN, RACHEL
RUGGERI, RICHARD E. ALLISON, JR.,
ANDREW CAMPION, BETH FORD,
MELLODY HOBSON, JORGEN VIG
KNUDSTORP, NEAL MOHAN, SATYA
NADELLA, DANIEL SERVITJE, MIKE
SIEVERT, and WEI ZHANG,

Defendants,

and

STARBUCKS CORPORATION,
Nominal Defendant.

PORTIA MCCOLLUM, Derivatively on
Behalf of Nominal Defendant STARBUCKS
CORPORATION,

Case No. 2:24-cv-01979-JHC

Plaintiff,

vs.

LAXMAN NARASIMHAN, RICHARD E.
ALLISON, JR., ANDREW CAMPION,
BETH FORD, MELLODY HOBSON,
JORGEN VIG KNUDSTORP, NEAL
MOHAN, DANIEL SERVITJE, MIKE
SIEVERT, WEI ZHANG, SATYA
NADELLA, and RACHEL RUGGERI,

Defendants,

-and-

STARBUCKS CORPORATION,
Nominal Defendant.

1 Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure (“Rule 42(a)”) and Local
2 Civil Rule 42, Plaintiffs Katherine King and Portia McCollum (“Plaintiffs”), Defendants Laxman
3 Narasimhan, Rachel Ruggeri, Richard E. Allison, Jr., Andrew Champion, Beth Ford, Mellody
4 Hobson, Jorgen Vig Knudstorp, Neal Mohan, Satya Nadella, Daniel Servitje, Mike Sievert and
5 Wei Zhang (the “Individual Defendants”), and Nominal Defendant Starbucks Corporation
6 (“Starbucks” and together with the Individual Defendants, “Defendants”), by and through their
7 undersigned counsel of record, submit the following stipulation to consolidate the above captioned
8 related shareholder derivative actions and to appoint co-lead counsel for Plaintiffs in these
9 proceedings:
10

11 WHEREAS, on October 21, 2024, Plaintiff Katherine King filed a shareholder derivative
12 action in this Court on behalf of Nominal Defendant Starbucks against the Individual Defendants
13 alleging, *inter alia*, violations of federal securities laws and breaches of fiduciary duty (the “*King*
14 *Action*”);
15

16 WHEREAS, on December 2, 2024, Portia McCollum filed a shareholder derivative action
17 in this Court on behalf of Nominal Defendant Starbucks against the Individual Defendants
18 alleging, *inter alia*, violations of federal securities laws and breaches of fiduciary duty based upon
19 the same facts and circumstances as those underlying the *King Action* (the “*McCollum Action*”
20 and together with the *King Action*, the “*Related Derivative Actions*”);
21

22 WHEREAS, counsel for Plaintiffs and Defendants (the “*Parties*”) have conferred regarding
23 the *Related Derivative Actions* and the appropriate next steps;

24 WHEREAS, Rule 42(a) provides that when actions involve “a common question of law or
25 fact,” the Court may “(1) join for hearing or trial any or all matters at issue in the actions;
26 (2) consolidate the actions; or (3) issue any other orders to avoid unnecessary cost or delay”;
27
28

1 WHEREAS, the Related Derivative Actions challenge substantially similar alleged
2 conduct by the same Company directors and executive officers, involve substantially similar
3 questions of law and fact, and are based on similar factual allegations;

4 WHEREAS, the Parties, therefore, respectfully submit that consolidation of the Related
5 Derivative Actions is appropriate, and that they should be consolidated for all purposes, including
6 pre-trial proceedings and any trial, to avoid potentially duplicative actions, and to prevent any
7 waste of the Court's and the Parties' resources;

8
9 WHEREAS, in order to realize the efficiencies made possible by consolidation of the
10 Related Derivative Actions, Plaintiffs agree that The Brown Law Firm, P.C. and Rigrodsky Law,
11 P.A.¹ shall be designated as Co-Lead Counsel for plaintiffs in the consolidated action;

12 WHEREAS, Defendants take no position regarding the appointment of Co-Lead Counsel
13 for Plaintiffs;

14 IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, by their
15 undersigned counsel, subject to approval of the Court, as follows:

16
17 1. The Related Derivative Actions are hereby consolidated for all purposes, including
18 pre-trial proceedings and trial, under consolidated case no. 2:24-cv-01720-JHC (the "Consolidated
19 Derivative Action").

20 2. Every pleading filed in the Consolidated Derivative Action, or in any separate
21 action included herein, shall bear the following caption:
22
23
24
25

26 _____
27 ¹ Attached hereto as Exhibits A and B are The Brown Law Firm, P.C. and Rigrodsky Law, P.A.'s firm
28 resumes, respectively.

1 UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF WASHINGTON
3 AT SEATTLE

4 IN RE STARBUCKS) Lead Case No. 2:24-cv-01720-JHC
5 CORPORATION STOCKHOLDER)
6 DERIVATIVE LITIGATION)
7 _____) (Consolidated with Case No. 2:24-cv-
8) 01979)
9 This Document Relates To:)
10)
11 ALL ACTIONS.)
12 _____)

13 3. All papers filed in connection with the Consolidated Derivative Action shall be
14 maintained in one file under Master File No. 2:24-cv-01720-JHC.

15 4. Co-Lead Counsel for plaintiffs for the conduct of the Consolidated Derivative
16 Action shall be:

17 **THE BROWN LAW FIRM, P.C.**

18 Timothy Brown
19 767 Third Avenue, Suite 2501
20 New York, NY 10017
21 Telephone: (516) 922-5427
22 Facsimile: (516) 344-6204

23 **RIGRODSKY LAW, P.A.**

24 Timothy J. MacFall
25 825 East Gate Boulevard, Suite 300
26 Garden City, NY 11530
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29 5. Plaintiffs' Co-Lead Counsel shall have the sole authority to speak for plaintiffs in
30 all matters regarding pre-trial procedure, trial, and settlement negotiations and shall make all work
31 assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation
32 and to avoid duplicative or unproductive effort.

1 6. Co-Lead Counsel shall be responsible for coordinating all activities and
2 appearances on behalf of plaintiffs. No motion, request for discovery, or other pre-trial or trial
3 proceedings will be initiated or filed by any plaintiffs except through Co-Lead Counsel.

4 7. Defendants' counsel may rely upon all agreements made with Co-Lead Counsel, or
5 other duly authorized representative of Co-Lead Counsel, and such agreements shall be binding
6 on all plaintiffs.

7 8. This Order shall apply to each related shareholder derivative action involving the
8 same or substantially the same allegations, claims, and defendants, and arising out of the same, or
9 substantially the same, transactions or events as the Consolidated Derivative Action, that is
10 subsequently filed in, removed to, reassigned to, or transferred to this Court. When a shareholder
11 derivative action that properly belongs as part *In re Starbucks Corporation Stockholder Derivative*
12 *Litigation*, Lead Case No. 2:24-cv-01720-JHC, is hereafter filed in this Court, removed to this
13 Court, reassigned to this Court, or transferred to this Court from another court, this Court requests
14 the assistance of counsel in calling to the attention of the clerk of the Court the filing, removal,
15 reassignment, or transfer of any case that might properly be consolidated as part of *In re Starbucks*
16 *Corporation Stockholder Derivative Litigation*, Lead Case No. 2:24-cv-01720-JHC, and counsel
17 to the Parties are to assist in assuring that counsel in subsequent actions receive notice of this order.
18 Unless otherwise ordered, the terms of all orders, rulings, and decisions in the Consolidated
19 Derivative Action shall apply to all later shareholder derivative actions involving Starbucks filed
20 in this Court, removed to this Court, reassigned to this Court, or transferred to this Court from
21 another court.

22 9. All papers and documents previously filed and/or served in the Related Derivative
23 Actions shall be deemed a part of the record in the Consolidated Derivative Action.

24 10. This Stipulation is without waiver or prejudice to any and all claims, defenses,
25 arguments, motions, or any requests for other relief that would otherwise be available to the Parties
26 in the Related Derivative Actions.

1 11. The Parties shall submit a proposed schedule to the Court within sixty (60) days of
2 entry of this Order. Defendants are not required to answer or otherwise respond to the respective
3 complaints filed in the Consolidated Derivative Action until the deadline set forth in the Court's
4 order on the Parties' proposed schedule.

5
6 **IT IS SO STIPULATED.**

7 Dated: January 3, 2025

Respectfully submitted,

8 By: /s/ Duncan C. Turner.
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15 *Attorneys for Plaintiff Katherine King and*
16 *Proposed Co-Lead Counsel for Plaintiffs*

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26 *Proposed Co-Lead Counsel for Plaintiff*
27

1 By: /s/ Pallavi Wahi

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Attorneys for Defendants

1 **ECF ATTESTATION**

2 Pursuant to Local Civil Rule 5, I attest that the concurrence in the filing of this document
3 has been obtained from all other signatories and the document has been served via ECF on all
4 parties.

5 Dated: January 3, 2025

6 /s/Duncan C. Turner
7 Duncan C. Turner, WSBA #20597

8
9 * * *

10
11 **ORDER**

12 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

13
14 Dated: January 3rd, 2025

15 John H. Chun
16 Hon. John H. Chun
17 United States District Judge