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Timothy Cook and Luca Maestri

8 [additional counsel appears on signature page]  
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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION  
13

14 IN RE APPLE INC. SECURITIES  
15 LITIGATION

Case No. 4:19-cv-02033-YGR

**CLASS ACTION**

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17 This Document Relates to:  
18 ALL ACTIONS.  
19

**STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING BRIEFING  
SCHEDULE FOR LEAD PLAINTIFF'S  
MOTION FOR CLASS CERTIFICATION**

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1 This Stipulation is entered into by and among lead plaintiff, the Norfolk County Council  
2 as Administering Authority of the Norfolk Pension Fund (“Norfolk” or “Lead Plaintiff”) and  
3 defendants Apple Inc., Timothy Cook, and Luca Maestri (collectively “Defendants”), through  
4 their respective attorneys of record.

5 WHEREAS, on December 22, 2020, the Court entered a Case Management Order which  
6 established deadlines for key events in the litigation including a briefing schedule for Lead  
7 Plaintiff’s Motion for Class Certification (the “Motion”) [Dkt. 128];

8 WHEREAS, on May 5, 2021 pursuant the December 22, 2020 Case Management Order  
9 Lead Plaintiff filed the Motion, which requests among other things, that Norfolk be appointed  
10 class representative [Dkt. 165];

11 WHEREAS, pursuant to the Case Management Order, Defendants are currently scheduled  
12 to file their opposition to the Motion on June 30, 2021; and Lead Plaintiff’s reply in support of the  
13 Motion is currently due on August 13, 2021;

14 WHEREAS, on June 1, 2021, following a discovery hearing concerning the scope and  
15 timing of Lead Plaintiff’s document productions, Judge Spero ordered: (i) that by June 11, 2021,  
16 Lead Plaintiff should complete production of documents reflecting Norfolk’s transactions in  
17 Apple securities for six months following the end of the class period, approximately three months  
18 more than Lead Plaintiff had already produced, and additional responsive documents located  
19 through the application of agreed upon search terms; and (ii) the parties to “meet and confer on a  
20 date for the class representative depositions and opposition to class certification” [Dkt. 176];

21 WHEREAS, Lead Plaintiff has agreed to make a deponent available for a deposition  
22 pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure on June 22, 2021;

23 WHEREAS, Defendants have proposed an adjustment to the briefing scheduled for the  
24 Motion to enable Defendants to prepare their opposition to the Motion;

25 NOW THEREFORE, the parties have met and conferred and agreed subject to the  
26 approval of the court, to extend the briefing schedule for the Motion as follows: the deadline for  
27 Defendants’ opposition to the Motion will be extended from June 30, 2021 to July 9, 2021, and  
28 the deadline for Lead Plaintiff’s reply in support of the Motion will be extended from August 13,

1 2021 to August 24, 2021.

2 **IT IS SO STIPULATED.**

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4 Dated: June 9, 2021

ORRICK, HERRINGTON & SUTCLIFFE LLP

5  
6 */s/ James N. Kramer*

JAMES N. KRAMER

Attorneys for Defendants

Apple Inc., Timothy Cook and Luca Maestri

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10 Dated: June 9, 2021

ROBBINS GELLER RUDMAN & DOWD LLP

11 */s/ Shawn A. Williams*

SHAWN A. WILLIAMS

Attorneys for Lead Plaintiff,

Norfolk County Council as Administering

Authority of the Norfolk Pension Fund

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16 **CIVIL L.R. 5-1 ATTESTATION**

17 Pursuant to Civil L.R. 5-1(i)(3), I, James N. Kramer, am the ECF user whose ID  
18 and password are being used to file this Stipulation and [Proposed] Order regarding Briefing  
19 Schedule for Lead Plaintiff's Motion for Class Certification. In compliance with General Order  
20 45, X.B., I hereby attest that Shawn A. Williams has concurred in this filing.

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22 */s/ James N. Kramer*

JAMES N. KRAMER

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

Dated: 6/11/2021



HONORABLE YVONNE GONZALEZ ROGERS