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13 Lead Counsel for Lead Plaintiff

14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 OAKLAND DIVISION

18 In re APPLE INC. SECURITIES)
 19 LITIGATION)

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

CLASS ACTION

20 _____)
 21 This Document Relates To:)

STIPULATION AND ~~PROPOSED~~ ORDER
EXPANDING DEPOSITION LIMIT

22 ALL ACTIONS.)
 23 _____)

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1 This Stipulation is entered into between Lead Plaintiff Norfolk County Council as
2 Administering Authority of the Norfolk Pension Fund and Defendants Apple Inc., Timothy D. Cook
3 and Luca Maestri (collectively, the “Parties”) in the above-captioned action, by and through their
4 undersigned counsel.

5 WHEREAS, Federal Rule of Civil Procedure 30(a)(2)(A)(i) provides that a party must obtain
6 leave of court or a stipulation from the other parties before taking a deposition, if that deposition
7 would result in more than ten depositions being taken by either plaintiffs or defendants;

8 WHEREAS, the Parties have met and conferred and reached an agreement to expand the
9 deposition limit, as set forth below;

10 NOW, THEREFORE, it is stipulated and agreed among the undersigned Parties, and
11 respectfully submitted for the Court’s approval as follows:

12 1. The limit of ten depositions set forth in Federal Rule of Civil Procedure 30(a)(2)(A)(i)
13 shall be expanded to 20 depositions per side; and

14 2. By entering into this Stipulation, the Parties do not concede the appropriateness of
15 any specific deposition, and reserve all rights to object to any specific deposition, under Federal Rule
16 of Civil Procedure 26(b)(2)(C) or otherwise, including on the grounds that such deposition would be
17 cumulative, duplicative, or not proportional to the needs of the case.

18 DATED: January 25, 2022

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23 s/ Shawn A. Williams
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DATED: January 25, 2022

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Attorneys for Defendants Apple Inc., Timothy
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ATTESTATION PURSUANT TO LOCAL RULE 5-1

I, Shawn A. Williams, am the ECF user whose identification and password are being used to file the STIPULATION AND [PROPOSED] ORDER EXPANDING DEPOSITION LIMIT. Pursuant to Local Rule 5-1(h)(3) and in compliance with General Order No. 45 X.B., I hereby attest that James N. Kramer has concurred in this filing.

DATED: January 25, 2022

s/ Shawn A. Williams
SHAWN A. WILLIAMS

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 25, 2022



THE HON. JOSEPH C. SPERO
UNITED STATES MAGISTRATE JUDGE