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

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

5 WHEREAS, on May 5, 2021, Lead Plaintiff filed a Motion for Class Certification (the
6 “Motion”) [Dkt. No. 165];

7 WHEREAS, on February 4, 2022, the Court issued an order granting in part and denying
8 in part the Motion (the “Order”) [Dkt. No. 224]. The Order denied without prejudice Lead
9 Plaintiff’s Motion with respect to holders of options on Apple stock and contemplated that Lead
10 Plaintiff may “re-seek certification with respect to this category of investors”;

11 WHEREAS, on March 4, 2022, the Court issued an order setting a deadline of April 15,
12 2022 for Lead Plaintiff to supplement its class certification motion regarding holders of options
13 on Apple stock [Dkt. No. 231];

14 WHEREAS, on April 15, 2022, Lead Plaintiff filed a Supplemental Motion to Certify
15 Class of Apple Options Investors (the “Supplemental Motion”) [Dkt. No. 239], which attached,
16 among other things, an expert report by Don Chance;

17 WHEREAS, Lead Plaintiff has agreed to make Professor Chance available for deposition
18 on June 8, 2022;

19 WHEREAS, it is Defendants’ current intention to file an expert report in connection with
20 its opposition to the Supplemental Motion;

21 WHEREAS, Plaintiff anticipates that a deposition of Defendants’ expert may be
22 necessary;

23 WHEREAS, the Parties have met and conferred and reached an agreement to set a
24 briefing schedule for the Supplemental Motion which sets forth sufficient time for all parties to
25 take any expert discovery, as set forth below;

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

28 1. Defendants shall file any opposition to the Supplemental Motion no later than June

1 24, 2022;

2 2. Lead Plaintiff shall file any reply in support of the Supplemental Motion no later
3 than August 26, 2022;

4 **IT IS SO STIPULATED.**

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6 Dated: April 28, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

7
8 /s/ James N. Kramer

JAMES N. KRAMER

Attorneys for Defendants

Apple Inc., Timothy Cook and Luca Maestri

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13 Dated: April 28, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

14
15 /s/ Shawn A. Williams

SHAWN A. WILLIAMS

Counsel for Lead Plaintiff,

Norfolk County Council as Administering
Authority of the Norfolk Pension Fund

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

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

24
25 /s/ James N. Kramer

JAMES N. KRAMER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 29, 2022


HONORABLE YVONNE GONZALEZ ROGERS

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