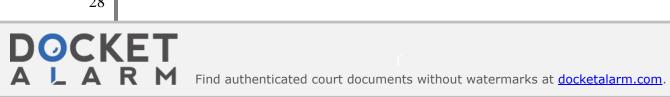
1	JAMES N. KRAMER (SBN 154709)		
2	jkramer@orrick.com ALEXANDER K. TALARIDES (SBN 268068) atalarides@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP		
3			
4	The Orrick Building 405 Howard Street		
5	San Francisco, CA 94105-2669 Telephone: (415) 773-5700		
6	Facsimile: (415) 773-5759		
7	Attorneys for Defendants Apple Inc., Timothy Cook and Luca Maestri		
8	[additional counsel appears on signature page]		
9			
10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION		
11			
12			
13			
14	IN RE APPLE INC. SECURITIES	Case No. 4:19-cy-02033-YGR	
15	LITIGATION	CLASS ACTION	
16	This Document Relates to: ALL ACTIONS.	STIPULATION AND [PROPOSED]	
17		ORDER REGARDING BRIEFING SCHEDULE FOR LEAD PLAINTIFF'S	
18	THE MOTIONS.	SUPPLEMENTAL MOTION FOR CLASS CERTIFICATION	
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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	1 24, 2022;		
2	2 2. Lead Plaintiff shall file a	2. Lead Plaintiff shall file any reply in support of the Supplemental Motion no later	
3	3 than August 26, 2022;	than August 26, 2022;	
4	IT IS SO STIPULATED.		
5	5		
6	Dated: April 28, 2022	ORRICK, HERRINGTON & SUTCLIFFE LLP	
7	7		
8	3	/s/ James N. Kramer	
9	9	JAMES N. KRAMER Attorneys for Defendants	
10		Apple Inc., Timothy Cook and Luca Maestri	
11	1		
12	2		
13	B Dated: April 28, 2022	ROBBINS GELLER RUDMAN & DOWD LLP	
14	4	/s/ Shawn A. Williams	
15	5	SHAWN A. WILLIAMS	
16	5	Counsel for Lead Plaintiff, Norfolk County Council as Administering	
17	7	Authority of the Norfolk Pension Fund	
18	3		
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	General Order 45, X.B., I hereby attest that Shawn A. Williams has concurred in this filing.	
24	4		
25	5	/s/ James N. Kramer	
26	5	JAMES N. KRAMER	
27	7		
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