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Timothy Cook and Luca Maestri

[additional counsel appears on signature page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE APPLE INC. SECURITIES
LITIGATION

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

CLASS ACTION

This Document Relates to:

ALL ACTIONS.

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING DEADLINE TO
SUBMIT STATEMENT OR
DECLARATION IN SUPPORT OF
SEALING REQUEST**

Hon. Yvonne Gonzalez Rogers

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 October 20, 2022, Lead Plaintiff filed its Opposition to Defendants’
6 Motion for Summary Judgment, and its Opposition to Defendants’ Motion to Exclude Expert
7 Testimony (collectively, the “Oppositions”);

8 WHEREAS, because the Oppositions make reference to a substantial volume of discovery
9 materials that Defendants have designated as Confidential or Highly Confidential pursuant to the
10 Stipulated Protective Order, Lead Plaintiff has also filed three Administrative Motions to
11 Consider Whether Another Party’s Material Should Be Sealed (the “Administrative Motions”)
12 [Dkt. Nos. 321, 322, and 323];

13 WHEREAS, in light of the volume of materials provisionally lodged under seal in
14 connection with the Administrative Motions, Defendants have requested a one-week extension of
15 the deadline set by Local Rule 79-5(f)(3) to file a statement and/or declaration in support of any
16 sealing request in connection with the Administrative Motions, and Lead Plaintiff does not
17 oppose that request;

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

20 Defendants shall file any statement and/or declaration in support of any sealing request in
21 connection with the Administrative Motions no later than November 3, 2022.

22 **IT IS SO STIPULATED.**

23
24 Dated: October 25, 2022

ORRICK, HERRINGTON & SUTCLIFFE LLP

25
26 */s/ James N. Kramer*

JAMES N. KRAMER

Attorneys for Defendants

Apple Inc., Timothy Cook, and Luca Maestri
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1
2 Dated: October 25, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

3
4 /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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8 **CIVIL L.R. 5-1 ATTESTATION**

9 Pursuant to Civil L.R. 5-1(i)(3), I, James N. Kramer, am the ECF user whose ID and
10 password are being used to file this Stipulation and [Proposed] Order regarding Deadline to
11 Submit Statement or Declaration in Support of Sealing Request. In compliance with General
12 Order 45, X.B., I hereby attest that Shawn A. Williams has concurred in this filing.
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14
15 /s/ James N. Kramer

JAMES N. KRAMER

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

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21 Dated: October 25, 2022


HONORABLE YVONNE GONZALEZ ROGERS