

1 JAMES N. KRAMER (SBN 154709)
 jkramer@orrick.com
 2 MICHAEL D. TORPEY (SBN 79424)
 mtorpey@orrick.com
 3 ALEXANDER K. TALARIDES (SBN 268068)
 atalarides@orrick.com
 4 ORRICK, HERRINGTON & SUTCLIFFE LLP
 The Orrick Building
 5 405 Howard Street
 San Francisco, CA 94105-2669
 6 Telephone: (415) 773-5700
 Facsimile: (415) 773-5759
 7

8 Attorneys for Defendants Apple Inc.,
 Timothy Cook and Luca Maestri

9 [additional counsel appears on signature page]

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: October 25, 2022

ROBBINS GELLER RUDMAN & DOWD LLP

/s/ Shawn A. Williams
SHAWN A. WILLIAMS
Counsel for Lead Plaintiff,
Norfolk County Council as Administering
Authority of the Norfolk Pension Fund

CIVIL L.R. 5-1 ATTESTATION

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

/s/ James N. Kramer
JAMES N. KRAMER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 25, 2022


HONORABLE YVONNE GONZALEZ ROGERS