	Case3:10-cv-01811-RS Document45-1	Filed05/27/10 Page1 of 5		
1 2 3 4 5 6 7 8 9 10	<ul> <li>BRUCE L. SIMON (Bar No. 96241)</li> <li>bsimon@pswplaw.com</li> <li>PEARSON, SIMON, WARSHAW &amp; PENNY, 44 Montgomery Street, Suite 2450</li> <li>San Francisco, California 94104</li> <li>Telephone: (415) 433-9000</li> <li>Facsimile: (415) 433-9008</li> <li>MICHAEL P. LEHMANN (Bar No. 77152)</li> <li>mlehmann@hausfeldllp.com</li> <li>HAUSFELD LLP</li> <li>44 Montgomery Street, Suite 3400</li> <li>San Francisco, California 94104</li> <li>Telephone: (415) 633-1908</li> <li>Facsimile: (415) 358-4980</li> <li>Attorneys for Plaintiff Jonathan Huber and All Others Similarly Situated</li> </ul>			
11	UNITED STATES DISTRICT COURT			
12	NORTHERN DISTRICT OF CALIFO	ORNIA, SAN FRANCISCO DIVISION		
13				
14	ANTHONY VENTURA, on behalf of himself and all others similarly situated,	Case No. 10-cv-1811-RS		
15	•	[PROPOSED] ORDER:		
16	Plaintiff,	<ul><li>(1) CONSOLIDATING CASES</li><li>(2) APPOINTING HAUSFELD LLP AND</li></ul>		
17	VS.	PEARSON, SIMON, WARSHAW, AND PENNY LLP AS CO-LEAD COUNSEL		
18	SONY COMPUTER ENTERTAINMENT AMERICA INC.,	(3) APPOINTING EXECUTIVE COMMITTEE		
19	Defendant.	Date: July 8, 2010		
20		Time: 1:30 Crtrm.: 3		
21	This do sum out also valetes to:	The Honorable Richard Seeborg		
22	This document also relates to:	C N 10 1045 DS		
23	TODD DENSMORE and ANTAL HERZ, on behalf of themselves and all others similarly	Case No. 10-cv-1945-RS		
24	situated,	The Honorable Richard Seeborg		
25	Plaintiffs,			
26	VS.			
27	SONY COMPUTER ENTERTAINMENT AMERICA, INC., a Delaware corporation,			
28	Defendant.			
	814873.1	10-cv-1811-RS		
	PROPOSED ORDER: (1) CONSOLIDATING CASES SIMON, WARSHAW & PENNY, LLP AS CO-LEAD	(2) APPOINTING HAUSFELD LLP & PEARSON, COUNSEL; (3) APPOINTING EXECUTIVE COMM.		

Case3:10-cv-01811-RS Document45-1	Filed05/27/10 Page2 of 5
This document also relates to:	
JASON BAKER, SEAN BOSQUETT, FRANK BACHMAN, PAUL GRAHAM, and	Case No. 10-cv-1897-RS
PAUL VANNATA, Individually and on Behalf of All Others Similarly Situated,	The Honorable Richard Seeborg
Plaintiffs,	
VS.	
SONY COMPUTER ENTERTAINMENT AMERICA, LLC successor to SONY COMPUTER ENTERTAINMENT AMERICA, INC.,	
Defendant.	
This document also relates to:	
KEITH WRIGHT, on behalf of himself and all others similarly situated,	Case No. 10-cv-1975-RS
Plaintiff,	The Honorable Richard Seeborg
vs.	
SONY COMPUTER ENTERTAINMENT AMERICA INC.; and SONY COMPUTER ENTERTAINMENT AMERICA, LLC.,	
Defendants.	
This document also relates to:	
JONATHAN HUBER, on Behalf of Himself and All Others Similarly Situated,	Case No. 10-cv-2213 DMR
Plaintiff,	The Honorable Donna M. Ryu
vs.	
SONY COMPUTER ENTERTAINMENT AMERICA, LLC, formerly SONY	
COMPUTER ENTERTAINMENT AMERICA, INC., a Delaware corporation,	
Defendant.	
814873.1	10-cv-1811-R

1	On June 24, 2010, at 1:30 am, the Court heard the motion of Plaintiff Jonathan Huber		
2	("Plaintiff") for an order: (1) consolidating cases; (2) appointing Hausfeld LLP and Pearson,		
3	Simon, Warshaw & Penny, LLP as Interim, Co-Lead Counsel; and (3) appointing an executive		
4	committee. Having reviewed the parties' papers and heard oral argument, and good cause		
5	appearing, the Court GRANTS Plaintiff's motion.		
6	IT IS HEREBY ORDERED:		
7	1. The following cases are consolidated:		
8	• Ventura v. Sony Computer Entertainment America Inc., 10-cv-1811-RS;		
9	• Densmore, et al. v. Sony Computer Entertainment America, Inc., 10-cv-1945-		
10	RS;		
11	• Baker, et al. v. Sony Computer Entertainment America, LLC, 10-cv-1897-RS;		
12	• Wright v. Sony Computer Entertainment America Inc. et al., 10-cv-1975-RS;		
13	• Harper, et al. v. Sony Computer Entertainment of America, Inc., 10-cv-2197-		
14	JL; and		
15	• <i>Huber v. Sony Computer Entertainment America LLC</i> , 10-cv-2213-DMR.		
16	The Court finds that these cases involve common questions of law and fact, pursuant to		
17	Fed. R. Civ. P. 42.		
18	2. Pursuant to Fed. R. Civ. P. 23(g)(3), Hausfeld LLP and Pearson, Simon, Warshaw		
19	& Penny, LLP are appointed Interim, Co-Lead Counsel based on the firms': (1) work in		
20	identifying or investigating potential claims in the action; (2) experience in handling class actions,		
21	other complex litigation, and claims of the type asserted in the action; (3) knowledge of the		
22	applicable law; and (4) resources the firms will commit to representing the class. Hausfeld LLP		
23	and Pearson, Simon, Warshaw & Penny, LLP shall have responsibility for and authority over the		
24	following matters on behalf of all Plaintiffs in the Consolidated Action:		
25	a. Determining and presenting in motions, briefs, oral argument or such other		
26	fashion as may be appropriate, the position of all of the Plaintiffs as to all		
27	matters arising during all pretrial and trial proceedings;		
28	b. Conducting or coordinating discovery on behalf of the Plaintiffs consistent <sup>814873.1</sup> 1 10-cv-1811-RS		
	PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON, SIMON, WARSHAW & PENNY, LLP AS CO-LEAD COUNSEL; (3) APPOINTING EXECUTIVE COMM.		

1       with the Federal Rules of Civil Procedure, including the preparation of         2       joint interrogatories, requests for production of documents, requests for         3       admissions and the examination of witnesses in depositions;         4       c.       Communicating with the Court;         5       d.       Communicating with defense counsel;         6       e.       Directing, supervising and monitoring the activities of Plaintiffs' counsel         7       and implementing procedures to ensure that schedules are met and         8       unnecessary expenditures of time and funds by counsel are avoided;         9       f.       Signing any consolidated complaint, motions, briefs, discovery requests or         10       objections, subpoenas or notices on behalf of all Plaintiffs         11       g.       Conducting all pre-trial proceedings on behalf of all Plaintiffs         13       h.       Employing and consulting with experts;         14       i.       Calling meetings of all Plaintiffs' counsel when appropriate;         15       j.       Conducting settlement discussions with defense counsel on behalf of the         16       Plaintiffs and the putative class;       It         17       k.       Informing all Plaintiffs' counsel of the progress of this         18       litigation as necessary;       It			
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4       c.       Communicating with the Court;         5       d.       Communicating with defense counsel;         6       e.       Directing, supervising and monitoring the activities of Plaintiffs' counsel and implementing procedures to ensure that schedules are met and unnecessary expenditures of time and funds by counsel are avoided;         7       Image: Signing any consolidated complaint, motions, briefs, discovery requests or objections, subpoenas or notices on behalf of all Plaintiffs or those plaintiffs filing the particular papers;         10       Onducting all pre-trial proceedings on behalf of all Plaintiffs         13       h.       Employing and consulting with experts;         14       i.       Calling meetings of all Plaintiffs' counsel when appropriate;         15       j.       Conducting settlement discussions with defense counsel on behalf of the Plaintiffs and the putative class;         17       k.       Informing all Plaintiffs and Plaintiffs' counsel in such a manner as to promote the orderly and efficient prosecution of this litigation and to avoid unnecessary duplication and unproductive efforts for all parties;         12       m.       Ensuring that work assignments to all Plaintiffs' counsel are made in the best interests of the Plaintiffs and the proposed class, and are made on the basis of the qualifications and expertise of the persons assigned particular tasks or responsibilities, counsel's knowledge of the law, facts and issues, efficiency and cost-effectiveness;         17       n.       Assessing Plaintiffs' co	2		joint interrogatories, requests for production of documents, requests for
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26       efficiency and cost-effectiveness;         27       n.       Assessing Plaintiffs' counsel's common litigation costs in proportion to the work performed by counsel and to collect all assessments on a regular         28       814873.1       2       10-cv-1811-RS         PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,	24		basis of the qualifications and expertise of the persons assigned particular
27       n.       Assessing Plaintiffs' counsel's common litigation costs in proportion to the         28       work performed by counsel and to collect all assessments on a regular         814873.1       2       10-cv-1811-RS         PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,	25		tasks or responsibilities, counsel's knowledge of the law, facts and issues,
28 work performed by counsel and to collect all assessments on a regular 814873.1 2 10-cv-1811-RS PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,	26		efficiency and cost-effectiveness;
814873.1       2       10-cv-1811-RS         PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,	27	n.	Assessing Plaintiffs' counsel's common litigation costs in proportion to the
PROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,	28	814873.1	
		PROPOSED ORDER	: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,

SIMON, WARSHAW & PENNY, LLP AS CO-LEAD COUNSEL; (3) APPOINTING EXECUTIVE COMM.

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1	basis;
2	o. Collecting and reviewing time, lodestar and expense reports from each
3	Plaintiff's Counsel, including paralegals and any other staff members; and
4	p. Otherwise coordinating the work of all Plaintiffs' counsel, and performing
5	such other duties as necessary or as authorized by further order of the
6	Court.
7	3. Pursuant to Fed. R. Civ. P. $23(g)(3)$ , the Court appoints the following firms to
8	work on an Executive Committee with the Interim, Co-Lead Counsel:
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12	IT IS SO ORDERED.
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14	Judge Richard Seeborg
15	United States District Court
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	814873.1310-cv-1811-RSPROPOSED ORDER: (1) CONSOLIDATING CASES (2) APPOINTING HAUSFELD LLP & PEARSON,SIMON, WARSHAW & PENNY, LLP AS CO-LEAD COUNSEL; (3) APPOINTING EXECUTIVE COMM.