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9 Attorneys for Plaintiff Jonathan Huber and All  
Others Similarly Situated

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

14 ANTHONY VENTURA, on behalf of himself  
and all others similarly situated,

15 Plaintiff,

16 vs.

17 SONY COMPUTER ENTERTAINMENT  
18 AMERICA INC.,

19 Defendant.

Case No. 10-cv-1811-RS

**[PROPOSED] ORDER:**  
**(1) CONSOLIDATING CASES**  
**(2) APPOINTING HAUSFELD LLP AND**  
**PEARSON, SIMON, WARSHAW, AND**  
**PENNY LLP AS CO-LEAD COUNSEL**  
**(3) APPOINTING EXECUTIVE**  
**COMMITTEE**

Date: July 8, 2010  
Time: 1:30  
Crtrm.: 3

The Honorable Richard Seeborg

21 This document also relates to:

22 TODD DENSMORE and ANTAL HERZ, on  
23 behalf of themselves and all others similarly  
situated,

24 Plaintiffs,

25 vs.

26 SONY COMPUTER ENTERTAINMENT  
27 AMERICA, INC., a Delaware corporation,

28 Defendant.

Case No. 10-cv-1945-RS

The Honorable Richard Seeborg

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This document also relates to:  
  
JASON BAKER, SEAN BOSQUETT,  
FRANK BACHMAN, PAUL GRAHAM, and  
PAUL VANNATA, Individually and on  
Behalf of All Others Similarly Situated,  
  
Plaintiffs,  
  
vs.  
  
SONY COMPUTER ENTERTAINMENT  
AMERICA, LLC successor to SONY  
COMPUTER ENTERTAINMENT  
AMERICA, INC.,  
  
Defendant.

Case No. 10-cv-1897-RS  
The Honorable Richard Seeborg

This document also relates to:  
  
KEITH WRIGHT, on behalf of himself and all  
others similarly situated,  
  
Plaintiff,  
  
vs.  
  
SONY COMPUTER ENTERTAINMENT  
AMERICA INC.; and SONY COMPUTER  
ENTERTAINMENT AMERICA, LLC.,  
  
Defendants.

Case No. 10-cv-1975-RS  
The Honorable Richard Seeborg

This document also relates to:  
  
JONATHAN HUBER, on Behalf of Himself  
and All Others Similarly Situated,  
  
Plaintiff,  
  
vs.  
  
SONY COMPUTER ENTERTAINMENT  
AMERICA, LLC, formerly SONY  
COMPUTER ENTERTAINMENT  
AMERICA, INC., a Delaware corporation,  
  
Defendant.

Case No. 10-cv-2213 DMR  
The Honorable Donna M. Ryu

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 • *Huber v. Sony Computer Entertainment America LLC*, 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

- 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 or those  
11 plaintiffs filing the particular papers;
  - 12 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;
  - 17 k. Informing all Plaintiffs and Plaintiffs' counsel of the progress of this  
18 litigation as necessary;
  - 19 l. Making all work assignments to Plaintiffs' counsel in such a manner as to  
20 promote the orderly and efficient prosecution of this litigation and to avoid  
21 unnecessary duplication and unproductive efforts for all parties;
  - 22 m. Ensuring that work assignments to all Plaintiffs' counsel are made in the  
23 best interests of the Plaintiffs and the proposed class, and are made on the  
24 basis of the qualifications and expertise of the persons assigned particular  
25 tasks or responsibilities, counsel's knowledge of the law, facts and issues,  
26 efficiency and cost-effectiveness;
  - 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

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basis;

- o. Collecting and reviewing time, lodestar and expense reports from each Plaintiff’s Counsel, including paralegals and any other staff members; and
- p. Otherwise coordinating the work of all Plaintiffs’ counsel, and performing such other duties as necessary or as authorized by further order of the Court.

3. Pursuant to Fed. R. Civ. P. 23(g)(3), the Court appoints the following firms to work on an Executive Committee with the Interim, Co-Lead Counsel:\_\_\_\_\_

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IT IS SO ORDERED.

\_\_\_\_\_  
Judge Richard Seeborg  
United States District Court