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Attorneys for Defendants
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REID HOFFMAN, JEFFREY KATZENBERG, STANLEY J.
MERESMAN, SUNIL PAUL, and OWEN VAN NATTA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE ZYNGA INC. SECURITIES
LITIGATION

This Document Relates To:
All Actions.

CLASS ACTION

Lead Case No. 12-cv-04007-JSW

Consolidated with Case Nos.
12-CV-4048-JSW, 12-CV-4059-JSW,
12-CV-4064-JSW, 12-CV-4066-JSW,
12-CV-4133-JSW, 12-CV-4250-JSW

**STIPULATION AND ~~PROPOSED~~
ORDER TO FILE BRIEFS RE MOTION
TO DISMISS IN EXCESS OF 15 PAGES**

Courtroom: 11, 19th Floor
Judge: Hon. Jeffrey S. White

1 WHEREAS, on April 3, 2013, Lead Plaintiff David Fee and Named Plaintiff Joy Arjoon-
2 Singh (“Plaintiffs”) filed the Consolidated Complaint (“Complaint”) in the above-entitled matter;

3 WHEREAS, Defendants Zynga Inc., Mark Pincus, David M. Wehner, John Schappert,
4 Mark Vranesh, William Gordon, Reid Hoffman, Jeffrey Katzenberg, Stanley J. Meresman, Sunil
5 Paul, and Owen Van Natta (collectively, the “Zynga Defendants”), and Morgan Stanley & Co.
6 LLC, Goldman, Sachs & Co., J.P. Morgan Securities LLC, Merrill Lynch, Pierce, Fenner &
7 Smith Incorporated, Barclays Capital Inc., and Allen & Company LLC (collectively, “the
8 Underwriter Defendants,” and together with the Zynga Defendants, “Defendants”) are scheduled
9 to file their motions to dismiss on May 31, 2013; Plaintiffs’ oppositions to the motions to dismiss
10 are due on July 12, 2013; and Defendants’ replies in support of their motions to dismiss are due
11 on August 9, 2013;

12 WHEREAS, all of the Defendants intend on filing motions to dismiss, with the Zynga
13 Defendants making their arguments together in a single motion, and the Underwriter Defendants
14 making their arguments together in a single motion;

15 WHEREAS, although Civil Local Rules 7-2 and 7-3 allow for the filing of briefs up to 25
16 pages in length, this Court’s Standing Order limits briefs on motions to dismiss to 15 pages;

17 WHEREAS, the Complaint includes 386 numbered paragraphs over 110 pages and asserts
18 six causes of action—three under the Securities Act of 1933 (for violations of Sections 11,
19 12(a)(2), and 15) and three under the Securities Exchange Act of 1934 (for violations of Sections
20 10(b), 20(a), and 20A)—against 17 Defendants;

21 WHEREAS, the parties have conferred, and believe that in light of the number and
22 complexity of issues presented by the Zynga Defendants’ anticipated motion to dismiss, including
23 the fact that the motion to dismiss will be filed on behalf of multiple defendants, it will be helpful
24 to the parties and to the Court, to permit the Zynga Defendants to file their opening brief on their
25 motion to dismiss not to exceed 30 pages, for Plaintiffs to file a brief opposing the Zynga
26 Defendants’ motion not to exceed 30 pages, and for the Zynga Defendants to file a reply brief not
27 to exceed 15 pages, exclusive of title pages, indices of cases tables of contents, exhibits, and
28 summaries of argument.

1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the undersigned
 2 parties that, subject to Court approval, the Zynga Defendants may file their opening brief on their
 3 motion to dismiss not to exceed ²⁵30 pages, Plaintiffs may file a brief opposing the Zynga
 4 Defendants' motion not to exceed ²⁵30 pages, and the Zynga Defendants may file a reply brief not
 5 to exceed 15 pages, exclusive of title pages, indices of cases, tables of contents, exhibits, and
 6 summaries of arguments.

7 Dated: May 22, 2013

JORDAN ETH
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By: /s/ Anna Erickson White

Anna Erickson White

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 and OWEN VAN NATTA

1 Dated: May 22, 2013

BERMAN DEVALERIO

2 By: /s/ Nicole Lavallee

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24 Lead Plaintiff David Fee and Named Plaintiff
25 Joy Arjoon-Singh

26 PURSUANT TO STIPULATION, IT IS SO ORDERED. AS MODIFIED.

27 Dated: May 23, 2013

28 By: Jeffrey S. White

The Honorable Jeffrey S. White
UNITED STATES DISTRICT JUDGE