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 SUNIL PAUL, and OWEN VAN NATTA

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

MARK H. DESTEFANO, Individually, and On  
 behalf of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
 WEHNER, JOHN SCHAPPERT, MARK  
 VRANESH, REGINALD D. DAVIS, CADIR B.  
 LEE, WILLIAM GORDON, REID HOFFMAN,  
 JEFFREY KATZENBERG, STANLEY J.  
 MERESMAN, SUNIL PAUL, OWEN VAN  
 NATTA, MORGAN STANLEY & CO., LLC,  
 GOLDMAN, SACHS & CO., J.P. MORGAN  
 SECURITIES LLC, MERRILL LYNCH,  
 PIERCE, FENNER & SMITH  
 INCORPORATED, BARCLAYS CAPITAL  
 INC., and ALLEN & COMPANY LLC,

Defendants.

*[Caption continues on following page.]*

Case No. 12-cv-4007-JSW

**CLASS ACTION**

**JOINT ADMINISTRATIVE  
 MOTION TO RELATE ACTIONS**

**[CIVIL L.R. 3-12]**

Judge: Jeffrey S. White  
 Complaint Filed: July 30, 2012  
 Trial Date: None Set

CORY DRAPER, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4017-RS

**RELATED CASE**

Judge: Hon. Richard Seeborg  
Complaint Filed: July 31, 2012  
Trial Date: None Set

JOHN CAMPUS, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, MARK VRANESH, and JOHN C.  
SCHAPPERT,

Defendants.

Case No. 12-cv-4048-YGR

**RELATED CASE**

Judge: Hon. Yvonne Gonzalez Rogers  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

STEVEN T. DIEMAND, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, REGINALD D.  
DAVIS, JEFF KARP, JOHN SCHAPPERT, and  
DAVID M. WEHNER,

Defendants.

Case No. 12-cv-4059-JSW

**RELATED CASE**

Judge: Hon. Jeffrey S. White  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

JAKE PHILLIPS, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4064-EJD

**RELATED CASE**

Judge: Hon. Edward J. Davila  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

WILLIAM B. WALKER, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4066-EMC

**RELATED CASE**

Judge: Hon. Edward M. Chen  
Complaint Filed: Aug 2, 2012  
Trial Date: None Set

IRA GAINES, Individually, and On Behalf Of All  
Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, JOHN SCHAPPERT, MARK  
VRANESH, REGINALD D. DAVIS, CADIR B.  
LEE, WILLIAM GORDON, REID HOFFMAN,  
JEFFREY KATZENBERG, STANLEY J.  
MERESMAN, SUNIL PAUL, and OWEN VAN  
NATTA,

Defendants.

Case No. 12-cv-4133-SBA

**RELATED CASE**

Judge: Hon. Sandra B. Armstrong  
Complaint Filed: Aug 6, 2012  
Trial Date: None Set

HOOMAN MOAYYED, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4250-EMC

**RELATED CASE**

Judge: Hon. Edward M. Chen  
Complaint Filed: Aug 13, 2012  
Trial Date: None Set

1 The parties in the above-captioned actions jointly bring this motion pursuant to Civil  
 2 Local Rule 3-12 for a determination that the action captioned *DeStefano v. Zynga Inc., et al.*, No.  
 3 3-12-CV-04007-JSW filed in this Court on July 30, 2012, is related to the following securities  
 4 class actions that were subsequently filed in this Court:

- 5 1. *Draper v. Zynga, Inc., et al.*, No. 12-cv-4017-RS (filed July 31, 2012)
- 6 2. *Campus v. Zynga, Inc., et al.*, No. 12-cv-4048-YGR (filed August 1, 2012)
- 7 3. *Diemand v. Zynga, Inc., et al.*, No. 12-cv-4059-JSW (filed August 1, 2012)
- 8 4. *Phillips v. Zynga, Inc., et al.*, No. 12-cv-4064-EJD (filed August 1, 2012)
- 9 5. *Walker v. Zynga, Inc., et al.*, No. 12-cv-4066-EMC (filed August 2, 2012)
- 10 6. *Gaines v. Zynga, Inc., et al.*, No. 12-cv-4133-SBA (filed August 6, 2012)
- 11 7. *Moayyed v. Zynga, Inc., et al.*, No. 12-cv-4250-EMC (filed August 13, 2012)

12 The above actions are related within the meaning of Civil Local Rule 3-12(a). Local Rule  
 13 3-12(a) states that an action is related to another when:

- 14 (1) the actions concern substantially the same parties, property,  
 15 transaction, or event; and
- 16 (2) it appears likely that there will be an unduly burdensome  
 17 duplication of labor and expense or conflicting results if the cases  
 are conducted before different Judges.

18 Both of these criteria are met here.

19 The actions identified above all purport to be class actions and assert substantially the  
 20 same claims against Zynga, Inc. (“Zynga”), certain of its directors, officers, and executives. One  
 21 of the actions also asserts claims against underwriters of Zynga’s initial and secondary public  
 22 offerings of stock on the NASDAQ exchange market. All of the actions were filed shortly after  
 23 Zynga’s July 25, 2012 earnings announcement of second quarter results and lowered guidance for  
 24 2012. All actions allege that Zynga misrepresented or failed to disclose material facts about its  
 25 business in public statements that were made before the July 25 announcement. Each plaintiff  
 26 seeks to represent a class of investors who purchased Zynga stock before the July 25  
 27 announcement.  
 28

1 All of the actions allege violations of the federal securities laws. All of the complaints  
 2 allege violations under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and SEC  
 3 Rule 10b-5. The *DeStefano* complaint also alleges violations of Sections 11, 12(a)(2), and 15 of  
 4 the Securities Act of 1933. These actions involve substantially overlapping events, parties, and  
 5 public statements. The cases raise common legal questions related to class certification and  
 6 liability.

7 There will be an unduly burdensome duplication of labor and expense and potentially  
 8 conflicting results if the cases are conducted before different judges, and assignment of a single  
 9 judge will conserve judicial resources and promote an efficient determination of these actions.

10 Accordingly, the parties respectfully request that the Court enter an order relating the  
 11 above listed actions pursuant to Local Rule 3-12. A [Proposed] Order relating the cases is  
 12 attached as **Exhibit A**.

13  
 14 Dated: August 30, 2012

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 22 VRANESH, REGINALD D. DAVIS, CADIR  
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 25 STANLEY J. MERESMAN, SUNIL PAUL,  
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28 Attorneys for Plaintiff Hooman Moayyed



**ECF ATTESTATION**

I, Mark R.S. Foster, am the ECF User whose ID and Password are being used to file this:

**JOINT ADMINISTRATIVE MOTION TO RELATE  
ACTIONS [CIVIL L.R. 3-12]**

In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Anna Erickson White, Simona G. Strauss, Nicole Lavallee, Shawn A. Williams, Jeremy A. Lieberman, Robert V. Prongay, Azra Z. Mehdi, and Patrick A. Moran have concurred in this filing.

Dated: August 30, 2012

MORRISON & FOERSTER LLP

By: /s/ Mark R.S. Foster

# **EXHIBIT A**

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 JEFFREY KATZENBERG, STANLEY J. MERESMAN,  
 SUNIL PAUL, and OWEN VAN NATTA

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

MARK H. DESTEFANO, On behalf of Himself  
 and All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
 WEHNER, JOHN SCHAPPERT, MARK  
 VRANESH, REGINALD D. DAVIS, CADIR B.  
 LEE, WILLIAM GORDON, REID HOFFMAN,  
 JEFFREY KATZENBERG, STANLEY J.  
 MERESMAN, SUNIL PAUL, OWEN VAN  
 NATTA, MORGAN STANLEY & CO., LLC,  
 GOLDMAN, SACHS & CO., J.P. MORGAN  
 SECURITIES LLC, MERRILL LYNCH,  
 PIERCE, FENNER & SMITH  
 INCORPORATED, BARCLAYS CAPITAL  
 INC., and ALLEN & COMPANY LLC,

Defendants.

*[Caption continues on following page.]*

Case No. 12-cv-4007-JSW

**CLASS ACTION**

**[PROPOSED] ORDER RELATING  
 ACTIONS**

Judge: Hon. Jeffrey S. White  
 Complaint Filed: July 30, 2012  
 Trial Date: None Set

CORY DRAPER, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4017-RS

**RELATED CASE**

Judge: Hon. Richard Seeborg  
Complaint Filed: July 31, 2012  
Trial Date: None Set

JOHN CAMPUS, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, MARK VRANESH, and JOHN C.  
SCHAPPERT,

Defendants.

Case No. 12-cv-04048-YGR

**RELATED CASE**

Judge: Hon. Yvonne Gonzalez Rogers  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

STEVEN T. DIEMAND, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, REGINALD D.  
DAVIS, JEFF KARP, JOHN SCHAPPERT, and  
DAVID M. WEHNER.

Defendants.

Case No. 12-cv-4059-JSW

**RELATED CASE**

Judge: Hon. Jeffrey S. White  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

JAKE PHILLIPS, Individually, and On Behalf Of  
All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT.

Defendants.

Case No. 12-cv-4064-EJD

**RELATED CASE**

Judge: Hon. Edward J. Davila  
Complaint Filed: Aug 1, 2012  
Trial Date: None Set

WILLIAM B. WALKER, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT.

Defendants.

Case No. 12-cv-4066-EMC

**RELATED CASE**

Judge: Hon. Edward M. Chen  
Complaint Filed: Aug 2, 2012  
Trial Date: None Set

IRA GAINES, Individually, and On Behalf Of All  
Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, JOHN SCHAPPERT, MARK  
VRANESH, REGINALD D. DAVIS, CADIR B.  
LEE, WILLIAM GORDON, REID HOFFMAN,  
JEFFREY KATZENBERG, STANLEY J.  
MERESMAN, SUNIL PAUL, and OWEN VAN  
NATTA.

Defendants.

Case No. 12-cv-4133-SBA

**RELATED CASE**

Judge: Hon. Sandra B. Armstrong  
Complaint Filed: Aug 6, 2012  
Trial Date: None Set

HOOMAN MOAYEED, Individually, and On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

ZYNGA, INC., MARK PINCUS, DAVID M.  
WEHNER, and JOHN SCHAPPERT,

Defendants.

Case No. 12-cv-4250-EMC

**RELATED CASE**

Judge: Hon. Edward M. Chen  
Complaint Filed: Aug 13, 2012  
Trial Date: None Set

**[PROPOSED] ORDER RELATING ACTIONS**

The Court has reviewed the Joint Administrative Motion filed by the parties in the above-captioned actions on August 28, 2012, to relate the actions pursuant to Civil Local Rule 3-12.

As the judge assigned to *DeStefano*, the earliest-filed case below that bears my initials, I find that the subsequently filed cases listed below are related to the case assigned to me, and such cases shall be reassigned to me pursuant to Local Rule 3-12:

1. *DeStefano v. Zynga Inc., et al.*, No. 3-12-CV-04007-JSW (filed August 20, 2012)
2. *Draper v. Zynga, Inc., et al.*, No. 12-cv-4017-RS (filed August 31, 2012)
3. *Campus v. Zynga, Inc., et al.*, No. 12-cv-4048-YGR (filed August 1, 2012)
4. *Diemand v. Zynga, Inc., et al.*, No. 12-cv-4059-JSW (filed August 1, 2012)
5. *Phillips v. Zynga, Inc., et al.*, No. 12-cv-4064-EJD (filed August 1, 2012)
6. *Walker v. Zynga, Inc., et al.*, No. 12-cv-4066-EMC (filed August 2, 2012)
7. *Gaines v. Zynga, Inc., et al.*, No. 12-cv-4133-SBA (filed August 6, 2012)
8. *Moayyed v. Zynga, Inc., et al.*, No. 12-cv-4250-EMC (filed August 13, 2012)

Counsel are instructed that all future filings in any reassigned cases are to bear my initials immediately after the case number. Any case management conference in any reassigned case will be rescheduled by the Court.

Unless otherwise ordered, any dates for hearing noticed motions are vacated and must be renoticed by the moving party before the newly assigned judge; any deadlines set by the ADR Local Rules remain in effect; and any deadlines established in a case management order continue to govern, except dates for appearance in court, which will be rescheduled by the Court.

The clerk of the Court is directed to take all necessary steps to reassign the cases in accordance with this Order.

IT IS SO ORDERED.

Dated: August \_\_\_\_, 2012

By: \_\_\_\_\_  
 THE HONORABLE JEFFREY S. WHITE  
 United States District Judge