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3	Attorneys for Defendants ZYNGA INC., MARK PINCUS, DAVID M. WEHI		
)	SCHAPPERT, MARK VRANESH, REGINALD D. CADIR B. LEE, WILLIAM GORDON, REID HOF		
)	JEFFREY KATZENBERG, STANLEY J. MERESM SUNIL PAUL, and OWEN VAN NATTA	IAN,	
L	······································		
2	UNITED STATES DISTRICT COURT		
;	NORTHERN DISTRICT	OF CALIFORNIA	
ŀ			
5	MARK H. DESTEFANO, Individually, and On	Case No. 12-cv-4007	-JSW
5	behalf of All Others Similarly Situated,	CLASS ACTION	
7	Plaintiff,	STIPULATON AND H	PROPOSED
3	v.	ORDER CONSOLIDA RELATED ACTIONS	TING
, ,	ZYNGA, INC., MARK PINCUS, DAVID M. WEHNER, JOHN SCHAPPERT, MARK	DEFERRING DEFEN DEADLINES TO RES	DANTS'
	VRANESH, REGINALD D. DAVIS, CADIR B.	DEADLINES TO KES	
)	LEE, WILLIAM GORDON, REID HOFFMAN, JEFFREY KATZENBERG, STANLEY J.		
-	MERESMAN, SUNIL PAUL, OWEN VAN NATTA, MORGAN STANLEY & CO., LLC,		
2	GOLDMAN, SACHS & CO., J.P. MORGAN SECURITIES LLC, MERRILL LYNCH,	Judge: Hon.	Jeffrey S. White
3	PIERCE, FENNER & SMITH INCORPORATED, BARCLAYS CAPITAL	Complaint Filed: July 3 Trial Date: None	0, 2012 Set
ŀ	INC., and ALLEN & COMPANY LLC,		
5	Defendants.		
;	[Caption continues on following page.]		
-			
н	STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES	AND DEFERRING RESPONSES	

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1 2	JOHN CAMPUS, Individually, and On Behalf Of All Others Similarly Situated,	Case No. 12-cv-4048-JSW
	Plaintiff,	RELATED CASE
3	V.	
4	ZYNGA INC., MARK PINCUS, DAVID M.	Judge: Jeffrey S. White
5 6	WEHNER, MARK VRANESH, and JOHN C. SCHAPPERT,	Complaint Filed: Aug 1, 2012 Trial Date: None Set
7	Defendants.	
8	STEVEN T. DIEMAND, Individually, and On Behalf Of All Others Similarly Situated,	Case No. 12-cv-4059-JSW
9	•	RELATED CASE
10	Plaintiff,	
11	V.	
12	ZYNGA INC., MARK PINCUS, REGINALD D. DAVIS, JEFF KARP, JOHN SCHAPPERT, and	Judge: Jeffrey S. White Complaint Filed: Aug 1, 2012
13	DAVID M. WEHNER,	Trial Date: None Set
14	Defendants.	
15		
16	JAKE PHILLIPS, Individually, and On Behalf Of All Others Similarly Situated,	Case No. 12-cv-4064-JSW
17	Plaintiff,	RELATED CASE
18	V.	
19	ZYNGA, INC., MARK PINCUS, DAVID M. WEHNER, and JOHN SCHAPPERT,	Judge:Jeffrey S. WhiteComplaint Filed:Aug 1, 2012
20	Defendants.	Trial Date: None Set
21		
22	WILLIAM B. WALKER, Individually, and On Behalf Of All Others Similarly Situated,	Case No. 12-cv-4066-JSW
23	Plaintiff,	RELATED CASE
24	v.	
25	ZYNGA, INC., MARK PINCUS, DAVID M.	Judge: Jeffrey S. White
26	WEHNER, and JOHN SCHAPPERT,	Complaint Filed: Aug 2, 2012 Trial Date: None Set
27	Defendants.	
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1 2	IRA GAINES, Individually, and On Behalf Of All Others Similarly Situated,		-4133-SBA
2 3	Plaintiff,	RELATED CASE]
4	v.		
5	ZYNGA INC., MARK PINCUS, DAVID M. WEHNER, JOHN SCHAPPERT, MARK	Judge: Complaint Filed:	Jeffrey S. White Aug 6, 2012
6	VRANESH, REGINALD D. DAVIS, CADIR B. LEE, WILLIAM GORDON, REID HOFFMAN,	Trial Date:	None Set
7	JEFFREY KATZENBERG, STANLEY J. MERESMAN, SUNIL PAUL, and OWEN VAN		
8	NATTA,		
9	Defendants.		
10	HOOMAN MOAYYED, Individually, and On Behalf Of All Others Similarly Situated,	Case No. 12-cv-	-4250-JSW
11	Plaintiff,	RELATED CASE	
12	V.		
13	ZYNGA, INC., MARK PINCUS, DAVID M.	Judge:	Jeffrey S. White
14	WEHNER, and JOHN SCHAPPERT,	Complaint Filed:	Aug 13, 2012
15	Defendants.	Trial Date:	None Set
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l	STIPULATION AND [Proposed] ORDER CONSOLIDATING CASES	AND DEFERRING RESPONS	SES

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1	All parties, through their undersigned counsel, hereby submit this Stipulation and		
2	[Proposed] Order consolidating related actions and deferring Defendants' deadlines to respond to		
3	the complaints.		
4	RECITALS		
5	A. Between July 30 and August 13, 2012, the above-captioned class actions (the		
6	"Related Actions") were filed in this Court. The Related Actions allege violations of the federal		
7	securities laws by Zynga Inc., certain of its directors, officers, and executives, as well as		
8	underwriters of Zynga's initial and secondary public offerings of stock on the NASDAQ		
9	exchange market.		
10	B. On August 30, 2012, the parties filed a Joint Administrative Motion to Relate		
11	Actions. (Doc. 24.)		
12	C. On September 17, 2012, the Court issued an order relating the actions. (Doc. 27.))	
13	D. The Related Actions cases are governed by the Private Securities Litigation		
14	Reform Act of 1995 (the "Reform Act").		
15	E. The Reform Act requires courts to address consolidation of related actions before		
16	appointing a lead plaintiff and lead counsel. See 15 U.S.C. §§ 77z-1(a)(3)(B), 78u-4(a)(3)(B).		
17	F. Motions for appointment of lead plaintiff and lead counsel are due on		
18	October 1, 2012.		
19	G. The parties believe that the actions should be consolidated pursuant to Federal		
20	Rule of Civil Procedure 42(a) because they involve common questions of law and fact, and		
21	substantially the same parties, events, and claims under the federal securities laws.		
22	H. The parties further believe that consolidation of the Related Actions would serve		
23	the interests of judicial economy and avoid the potential for conflicting rulings.		
24	THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:		
25	I. CONSOLIDATION		
26	1. The parties agree that the following actions should be consolidated for a	ıll	
27	purposes, including pre-trial proceedings and trial:		
28			

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	ABBREVIATED CASE NAME	CASE NUMBER	DATE FILED
	Destafano v. Zynga, Inc., et al.	12-CV-4007-JSW	July 30, 2012
	Campus v. Zynga Inc., et al.	12-CV-4048-JSW	August 1, 2012
	Diemand v. Zynga Inc., et al.	12-CV-4059-JSW	August 1, 2012
	Phillips v. Zynga, Inc., et al. Walkery: Zwag, Inc., et al.	12-CV-4064-JSW	August 1, 2012
	Walker v. Zynga, Inc., et al. Gaines v. Zynga Inc., et al.	12-CV-4066-JSW 12-CV-4133-JSW	August 2, 2012 August 6, 2012
5	Moayyed v. Zynga, Inc., et al.	12-CV-4250-JSW	August 13, 2012
	2. Every pleading filed in the conso	lidated action, or in any sepa	rate action included
	herein, shall bear the following caption:		
	UNITED STATES	DISTRICT COURT	
	NORTHERN DISTRI	CT OF CALIFORNIA	
	IN RE ZYNGA INC. SECURITIES) LITIGATION)	CLASS ACTION	
)	Lead Case No. 12-cv-0400	7-JSW
)	Consolidated with Case No	os.
)	12-CV-4048-JSW	
	This Document Relates To:)	12-CV-4059-JSW	
	All Actions.	12-CV-4064-JSW	
))	12-CV-4066-JSW 12-CV-4133-JSW	
)	12-CV-4250-JSW	
)		
	3. The files of the consolidated act	ion shall be maintained in c	one file under Lead
	Case No. 12-cv-04007-JSW.		
	4. This Order shall apply to each c	ase, arising out of the same	or substantially the
	same transactions or events as these cases, which	n is subsequently filed in or de	eemed related to the
	existing Related Actions.		
	STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CA Case No. 3:12-cv-04007-JSW sf-3184277	ASES AND DEFERRING RESPONSES	2

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II.

RESPONSE DEADLINE DEFERRED

5. Defendants shall have no obligation to answer or otherwise respond to any of the
complaints filed in the Related Actions or any subsequently related action until after the Court
appoints a lead plaintiff and lead counsel for the consolidated actions pursuant to the provisions
of the Reform Act.

6 6. Defendants will meet and confer with the court-appointed lead counsel within
7 fourteen days after the Court makes its appointment to discuss a schedule for the filing of a

8 consolidated amended complaint and Defendants' response, including their currently anticipated

9 motions to dismiss.

10	Dated: September 25, 2012	JORDAN ETH ANNA ERICKSON WHITE	
11		PHILIP T. BESIROF	
12		MARK R.S. FOSTER MORRISON & FOERSTER LLP	
13		By: /s/ Anna Erickson White	
14		JORDAN ETH	
15		Attorneys for Defendants	
16		ZYNGĂ INC., MARK PINCUS, DAVID M. WEHNER, JOHN SCHAPPERT, MARK	
17		VRANESH, REGINALD D. DAVIS, CADIR B. LEE, WILLIAM GORDON, REID HOFFMAN, JEFFREY KATZENBERG,	
18		STANLEY J. MERESMAN, SUNIL PAUL, and OWEN VAN NATTA	
19			
20		BRUCE ANGIOLILLO SIMONA G. STRAUSS	
21		SIMPSON THACHER & BARTLETT LLP	
22		By: /s/ Simona G. Strauss	
23		SIMONA G. STRAUSS	
24		Attorneys for Defendants MORGAN STANLEY & CO., LLC,	
25		GOLDMAN, SACHS & CO., J.P. MORGAN SECURITIES LLC, MERRILL LYNCH,	
26		PIERCE, FENNER & SMITH INCORPORATED, BARCLAYS CAPITAL	
27		INC., and ALLEN & COMPANY LLC	
28			
	STIPULATION AND [PROPOSED] ORDER CON	ISOLIDATING CASES AND DEFERRING RESPONSES	

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1	SHAWN A. WILLIAMS DARREN J. ROBBINS
2	DAVID C. WALTON ROBBINS GELLER RUDMAN & DOWD LLP
3	and
4	ALFRED G. YATES, J.R.
5	LAW OFFICE OF ALFRED G. YATES, J.R. P.C.
6 7	By: /s/ Shawn A. Williams
8	SHAWN A. WILLIAMS Attorneys for Plaintiff Hooman Moayyed
9	
10	-[PROPOSED] ORDER
11	
12	Pursuant to stipulation, it is SO ORDERED.
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14	By: Jeffrey Swhite
15	THE HONOLULL JEFFREY S. WHITE United States District Judge
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17	Dated: <u>September 26</u> , 2012
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	STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES AND DEFERRING RESPONSES