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11 Co-Lead Counsel for Plaintiffs

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 OAKLAND DIVISION

16 In re GOOGLE INC. SHAREHOLDER ) Master File No. CV-11-04248-PJH  
 17 DERIVATIVE LITIGATION )  
 )  
 18 ) STIPULATION AND [PROPOSED] ORDER  
 ) REGARDING BRIEFING SCHEDULE  
 19 This Document Relates To: )  
 )  
 20 ALL ACTIONS. )  
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1 WHEREAS, plaintiffs filed the Amended Verified Consolidated Shareholder Derivative  
2 Complaint on June 8, 2012 (the “Amended Complaint”) (Docket No. 52);

3 WHEREAS, having met and conferred, the parties filed a Stipulation and [Proposed] Order  
4 Setting Briefing and Hearing Schedule for Defendants’ Motion to Dismiss the Amended Verified  
5 Consolidated Shareholder Derivative Complaint (the “Briefing Schedule”), which this Court signed  
6 on July 3, 2012 (Docket No. 54);

7 WHEREAS, on July 6, 2012, pursuant to the Briefing Schedule, defendants filed a Notice of  
8 Motion and Motion to Dismiss Amended Verified Consolidated Shareholder Derivative Complaint  
9 and Memorandum of Points and Authorities in Support (“Motion to Dismiss”) (Docket No. 55);

10 WHEREAS, on August 10, 2012, pursuant to the Briefing Schedule, plaintiffs filed their  
11 Opposition to Defendants’ Motion to Dismiss (Docket No. 62);

12 WHEREAS, pursuant to the Briefing Schedule, defendants’ reply in support of their Motion  
13 to Dismiss is due on September 14, 2012;

14 WHEREAS, a hearing regarding defendants’ Motion to Dismiss is currently scheduled for  
15 October 24, 2012;

16 WHEREAS, the Board of Directors of nominal defendant Google, Inc. has formed an  
17 informal working group (“Special Committee”) to investigate the allegations contained in the  
18 Amended Complaint;

19 WHEREAS, the parties have met and conferred and agreed that, in conjunction with the  
20 Special Committee’s investigation, the parties should explore the potential resolution of the above  
21 captioned litigation;

22 WHEREAS, the parties have agreed that the Briefing Schedule should be modified to  
23 accommodate the Special Committee’s investigation and the parties settlement discussions;

24 THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and between the  
25 undersigned, subject to Court approval, as follows:

26 1. This litigation shall be stayed for 90 days of the date this Stipulation is signed by the  
27 Court, to allow the Special Committee to conduct its investigation and the parties to explore a  
28 potential resolution of the above captioned litigation;



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DATED: August 29, 2012

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s/ Boris Feldman  
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Counsel for Defendants and Nominal Defendant  
Google Inc.

I, Benny C. Goodman III, am the ECF user whose identification and password are being used  
to file the Stipulation and [Proposed] Order Regarding Briefing Schedule.

1 In compliance with Local Rule 5-1(i)(3), I hereby attest that Elizabeth C. Peterson and Boris  
2 Feldman have concurred in this filing.

3 DATED: August 29, 2012

4 \_\_\_\_\_  
s/ Benny C. Goodman III  
BENNY C. GOODMAN III

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7 \* \* \*

8 PURSUANT TO STIPULATION, IT IS SO ORDERED. This litigation shall be stayed for  
9 90 days of the date this Stipulation is Ordered by the Court.

10 DATED: \_\_\_\_\_  
11 THE HONORABLE PHYLLIS J. HAMILTON  
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 29, 2012.

s/ Benny C. Goodman III  
BENNY C. GOODMAN III

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## Mailing Information for a Case 4:11-cv-04248-PJH

### Electronic Mail Notice List

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