

1 JEROME C. ROTH (SBN 159483)
jerome.roth@mto.com
2 ROSEMARIE T. RING (SBN 220769)
rose.ring@mto.com
3 JONATHAN H. BLAVIN (SBN 230269)
jonathan.blavin@mto.com
4 WILLIAM J. EDELMAN (SBN 285177)
william.edelman@mto.com
5 MUNGER, TOLLES & OLSON LLP
560 Mission Street
6 Twenty-Seventh Floor
San Francisco, California 94105-2907
7 Telephone: (415) 512-4000
Facsimile: (415) 512-4077

8 Attorneys for Defendant
9 LINKEDIN CORPORATION

LARRY C. RUSS (SBN 82760)
lruss@raklaw.com
DORIAN S. BERGER (SBN 264424)
dberger@raklaw.com
DANIEL P. HIPSKIND (SBN 266763)
dhipskind@raklaw.com
RUSS AUGUST & KABAT
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Telephone: (310) 826-7424
Facsimile: (310) 826-6991

MICHAEL W. SOBOL (SBN 194857)
msobol@lchb.com
NICHOLAS R. DIAMAND (*Pro Hac Vice*)
ndiamand@lchb.com
MELISSA GARDNER (SBN 289096)
mgardner@lchb.com
LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Attorneys for Plaintiffs
PAUL PERKINS ET AL.

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN JOSE DIVISION

19 PAUL PERKINS, PENNIE SEMPELL, ANN
20 BRANDWEIN, ERIN EGGERS, CLARE
21 CONNAUGHTON, JAKE KUSHNER,
22 NATALIE RICHSTONE, NICOLE CROSBY,
and LESLIE WALL, individually and on
behalf of all other similarly situated,

23 Plaintiffs,

24 vs.

25 LINKEDIN CORPORATION,

26 Defendant.

Case No. 13-CV-04303-LHK

**FURTHER JOINT CASE MANAGEMENT
STATEMENT**

Judge: Hon. Lucy H. Koh
Date: February 11, 2015
Time: 1:30 p.m.
Courtroom: 8

1 Pursuant to Civil Local Rule 16-10(d), Plaintiffs Paul Perkins, Pennie Sempell, Ann
2 Brandwein, Erin Eggers, Clare Connaughton, Jake Kushner, Natalie Richstone, Nicole Crosby,
3 Leslie Wall (“Plaintiffs”) and Defendant LinkedIn Corporation (“LinkedIn”) (collectively, the
4 “Parties”) respectfully submit this Joint Case Management Statement in advance of the Case
5 Management Conference set for February 11, 2015.

6 On November 14, 2014, the Court granted in part and denied in part LinkedIn’s motion to
7 dismiss Plaintiffs’ Second Amended Complaint with leave to amend. *See* ECF No. 69. Plaintiffs
8 filed a Third Amended Complaint on December 16, 2014. *See* ECF No. 70. On January 13, 2015,
9 the Parties participated in a mediation session with Mr. Antonio Piazza. The Parties have accepted
10 a mediator’s proposal for a class action settlement subject to reaching agreement on remaining
11 material terms and execution of a written settlement agreement. The Parties will notify the Court
12 of their progress on February 25, 2015 and, if they have reached agreement on all material terms
13 by that date, will file a motion for preliminary approval on or before March 24, 2015.

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: February 4, 2015

MUNGER, TOLLES & OLSON LLP

JEROME C. ROTH
ROSEMARIE T. RING
JONATHAN H. BLAVIN
WILLIAM J. EDELMAN

By: /s/ Jerome C. Roth

JEROME C. ROTH

*Attorneys for Defendant
LinkedIn Corporation*

DATED: February 4, 2015

RUSS AUGUST & KABAT

LARRY C. RUSS
DORIAN S. BERGER
DANIEL P. HIPSKIND

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

MICHAEL W. SOBOL
NICHOLAS R. DIAMAND
MELISSA GARDNER

By: /s/ Nicholas R. Diamand

NICHOLAS R. DIAMAND

*Attorneys for Plaintiffs
Paul Perkins et al.*

Filer's Attestation

I, Jerome C. Roth, am the ECF user whose identification and password are being used to file this **FURTHER JOINT CASE MANAGEMENT STATEMENT**. In compliance with General Order 45.X.B, I hereby attest that Nicholas R. Diamand concurs in this filing.

DATED: February 4, 2015

/s/ Jerome C. Roth