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United States District Court  
Northern District of California

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

Case No. 18-cv-06753-PJH

This Document Relates To:  
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~  
ORDER GRANTING  
ADMINISTRATIVE MOTION TO  
RELATE AND CONSOLIDATE  
CASES FOR PRETRIAL PURPOSES  
AS MODIFIED BY THE COURT**

1 Pursuant to Civ. L.R. 7-11(a) and 7-12, the undersigned parties hereby stipulate as follows:

2 **WHEREAS**, on July 27, 2020, the case captioned *Simmons v. Ripple Labs, Inc.*, No. 20-cv-  
3 5127-KAW, was transferred to this District from the Southern District of New York, *Simmons*, ECF  
4 16 at 1;

5 **WHEREAS**, the complaint in *Simmons* involves claims, allegations, and parties that are  
6 substantially similar to the operative complaint in *In re Ripple Labs Litigation*;

7 **WHEREAS**, all the affected parties in both actions—specifically, Defendants Ripple Labs  
8 Inc., XRP II LLC, and Bradley Garlinghouse, Lead Plaintiff Bradley Sostack, and Plaintiff Daniel  
9 Simmons—hereby stipulate that *Simmons* is related to the putative class action *In re Ripple Labs*  
10 *Litigation* pending before the Court;

11 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff  
12 Bradley Sostack, Plaintiff Daniel Simmons, and Defendants Ripple Labs, Inc., XRP II LLC, and  
13 Bradley Garlinghouse, through their respective counsel, that:

- 14 1. The *Simmons* action is related to *In re Ripple Labs Litigation* and, under the Court’s  
15 standing order, Dkt. 35 at ¶¶ 6-7, that it should be consolidated therewith.

16

17 Dated: August 6, 2020

18 By: /s/ P. Ryan Burningham  
19 P. Ryan Burningham (*pro hac vice*)  
20 SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
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21 *Counsel for Lead Plaintiff*  
22 *Bradley Sostack*

By: /s/ Menno Goedman  
Menno Goedman  
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*Counsel for Defendants Ripple Labs, Inc.,*  
*XRP II LLC, and Bradley Garlinghouse*

23 By: /s/ Ross E. Pitcoff  
24 Ross E. Pitcoff  
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26 New York, NY 10016


27 *Counsel for Plaintiff*  
28 *Daniel Simmons*

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Pursuant to the foregoing stipulation, **IT IS SO ORDERED**. The court directs the clerk to take all action prescribed to it under paragraph 7 of this court’s March 18, 2019 order regarding publication of notice (Dkt. 35).

Dated: August 21, 2020

Phyllis J. Hamilton  
UNITED STATES DISTRICT JUDGE



**SIGNATURE ATTESTATION**

I, Menno Goedman, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized its filing.

By: /s/ Menno Goedman  
Menno Goedman