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8 *Attorneys for Defendants QuantumScape*
Corporation, Jagdeep Singh, Timothy
 9 *Holme, and Kevin Hettrich*

10 [Additional Counsel on Signature Block]

11 **UNITED STATES DISTRICT COURT**
 12 **NORTHERN DISTRICT OF CALIFORNIA**
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14	IN RE QUANTUMSCAPE SECURITIES)	CASE NO.: 3:21-CV-00058-WHO
15	CLASS ACTION LITIGATION)	
16)	STIPULATION AND [PROPOSED]
17)	ORDER TO STAY ALL
18)	PROCEEDINGS AND VACATE
19)	DATES IN SCHEDULING ORDERS
20)	
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 28 STIPULATION AND [PROPOSED] ORDER
 TO STAY PROCEEDINGS AND VACATE
 SCHEDULING ORDERS
 3:21-CV-00058-WHO

1 Defendants QuantumScape Corporation, Jagdeep Singh, Kevin Hettrich, and Timothy
2 Holme (“Defendants”) and Lead Plaintiff Frank Fish, named Plaintiff Mary Cranny, and named
3 Plaintiff Kathy Stark (“Plaintiffs”) (collectively with Defendants, the “Parties”) stipulate and agree
4 as follows:

5 WHEREAS, on June 8, 2023, the Court entered the Parties’ stipulated case schedule (the
6 “Case Schedule Order”), setting various deadlines for the completion of discovery, dispositive
7 motion practice, and setting a trial date of February 24, 2025 (ECF No. 190);

8 WHEREAS, on March 11, 2024, the Court entered the Parties’ stipulated extension of
9 certain expert discovery deadlines (ECF No. 209), leaving the remaining deadlines in the Case
10 Schedule Order unaffected;

11 WHEREAS, the Parties reached an agreement in principle to settle the litigation, and
12 subsequently entered a Stipulation of Settlement, with related exhibits;

13 WHEREAS, on June 11, 2024, Plaintiffs filed their Motion for Preliminary Approval of
14 Proposed Class Action Settlement (the “Preliminary Approval Motion”);

15 WHEREAS, the Parties agree that to conserve judicial and the Parties’ resources, all
16 deadlines should be vacated;

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by the Parties
18 through their undersigned counsel, that:

- 19 1. All deadlines in this action are vacated other than in connection with the Court’s
20 review of the proposed settlement, including the Preliminary Approval Motion.

21 **IT IS SO STIPULATED.**

22 DATED: June 11, 2024

LEVI & KORSINSKY, LLP

24 By: /s/ Nicholas I. Porritt

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*Attorneys for the Lead and Named Plaintiffs
and the Class*

DATED: June 11, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Ignacio E. Salceda
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[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE

ATTESTATION

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I, Ignacio E. Salceda, am the ECF User whose identification and password are being used to file the **STIPULATION AND [PROPOSED] ORDER TO STAY ALL PROCEEDINGS AND VACATE DATES IN SCHEDULING ORDERS**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 11, 2024

By: /s/ Ignacio E. Salceda
Ignacio E. Salceda