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8 Entertainment PLC, Hope Cochran,
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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN FRANCISCO

12
13 IN RE KING DIGITAL ENTERTAINMENT
14 plc SHAREHOLDER LITIGATION

Lead Case No.: CGC-15-544770

CLASS ACTION

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16
17 This Document Relates To:
18 ALL ACTIONS.

19 **STIPULATION AND ~~PROPOSED~~**
20 **ORDER WITHDRAWING: (1) THE**
21 **KING DEFENDANTS' DECEMBER 28,**
22 **2016 SUPPLEMENTAL SUBMISSION**
23 **REGARDING PLAINTIFFS' MOTION**
24 **FOR PRELIMINARY APPROVAL OF**
25 **SETTLEMENT AND ACCOMPANYING**
26 **APPENDIX OF EXHIBITS; AND (2) THE**
27 **CLASS REPRESENTATIVES'**
28 **DECEMBER 28, 2016 SUPPLEMENTAL**
SUBMISSION REGARDING CLASS
REPRESENTATIVES' MOTION FOR
PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT AND
ATTACHED EXHIBITS

STIP. AND ~~PROP.~~ ORDER WITHDRAWING
SUPP. SUBMISSIONS AND EXS. THERETO

LEAD CASE NO.: CGC-15-544770

FILED
San Francisco County Superior Court
FEB 1 - 2017
CLERK OF THE COURT
By: [Signature]
Deputy Clerk

1 This stipulation is entered into by and among: (i) Class Representatives; (ii) defendants
2 King Digital Entertainment plc (“King” or the “Company”), Hope Cochran, Robert S. Cohn, and
3 E. Stanton McKee (collectively with King, the “King Defendants”); and (iii) J.P Morgan
4 Securities LLC, Credit Suisse Securities (USA) LLC, Merrill Lynch, Pierce, Fenner & Smith
5 Incorporated, Barclays Capital Inc., Deutsche Bank Securities Inc., RBC Capital Markets, LLC,
6 BMO Capital Markets Corp., Cowen and Company, LLC, Pacific Crest Securities LLC, Piper
7 Jaffray & Co., Stifel, Nicolaus & Company, Incorporated, Wedbush Securities Inc. and Raine
8 Securities LLC (the “Underwriter Defendants”) (together with the King Defendants,
9 “Defendants”).

10 WHEREAS, on December 28, 2016, the King Defendants conditionally lodged under seal
11 their Supplemental Submission Regarding Plaintiffs’ Motion for Preliminary Approval of
12 Settlement (“King Defendants’ Supplemental Submission”) and an Appendix of Exhibits thereto,
13 publicly filed a redacted version of those same documents, and filed an accompanying motion to
14 seal certain portions of the King Defendants’ Supplemental Submission and Appendix of
15 Exhibits;

16 WHEREAS, on December 28, 2016, Class Representatives also conditionally lodged
17 under seal their Supplemental Submission Regarding Class Representatives’ Motion for
18 Preliminary Approval of Class Action Settlement and attached exhibits (“Class Representatives’
19 Supplemental Submission”), publicly filed a redacted version of those same documents, and
20 provided notice to Defendants pursuant to Cal. R. Ct. 2.551 of the conditional lodging of those
21 documents;

22 WHEREAS, on January 9, 2017, the King Defendants timely filed a motion to seal Class
23 Representatives’ Supplemental Submission and attached exhibits;

24 WHEREAS, on January 12, 2017, the Court entered an order denying both of the King
25 Defendants’ motions to seal (the “January 12 Order”) and requested that the parties (1) withdraw
26 documents subject to the motions to seal; and (2) refile any modified documents by January 26,
27 2017;

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1 WHEREAS, the parties met and conferred and determined to withdraw their respective
2 December 28, 2016 supplemental submissions and exhibits thereto;

3 WHEREAS, the parties have requested that the clerk return the copies of the King
4 Defendants' Supplemental Submission, Appendix of Exhibits thereto, and the Class
5 Representatives' Supplemental Submission and attached exhibits that were conditionally lodged
6 under seal on December 28, 2016;

7 WHEREAS, the parties agree that, in the interests of the clarity of the public record, the
8 redacted versions of the King Defendants' Supplemental Submission, Appendix of Exhibits
9 thereto, and the Class Representatives' Supplemental Submission and attached exhibits, each
10 publicly-filed on December 28, 2016, should be withdrawn from the public docket;

11 WHEREAS, pursuant to the January 12 Order, the parties intend to file modified
12 submissions on January 26, 2017.

13 THEREFORE, IT IS HEREBY STIPULATED by the parties, through their counsel of
14 record as follows:

15 1. The version of the King Defendants' Supplemental Submission which was
16 conditionally lodged under seal on December 28, 2016 shall not be filed on the public docket.

17 2. The version of the King Defendants' Appendix of Exhibits which was conditionally
18 lodged under seal on December 28, 2016 shall not be filed on the public docket.

19 3. The version of the Class Representatives' Supplemental Submission (including
20 attached exhibits) which was conditionally lodged under seal on December 28, 2016 shall not be
21 filed on the public docket.

22 4. The redacted version of the King Defendants' Supplemental Submission, which was
23 publicly filed on December 28, 2016, will be withdrawn from the public docket.

24 5. The redacted version of the King Defendants' Appendix of Exhibits, which was
25 publicly filed on December 28, 2016, will be withdrawn from the public docket.

26 6. The redacted version of the Class Representatives' Supplemental Submission
27 (including attached exhibits), which was publicly filed on December 28, 2016, will be withdrawn
28

1 from the public docket.

2 DATED: January 23, 2017

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12 DATED: January 23, 2017

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1 Dated: January 23, 2017

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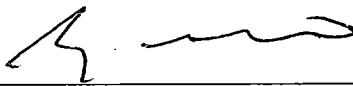
* * *

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, IT IS HEREBY ORDERED THAT:

1. The version of the King Defendants' Supplemental Submission which was conditionally lodged under seal on December 28, 2016 shall not be filed on the public docket.
2. The version of the King Defendants' Appendix of Exhibits which was conditionally lodged under seal on December 28, 2016 shall not be filed on the public docket.
3. The version of the Class Representatives' Supplemental Submission (including attached exhibits) which was conditionally lodged under seal on December 28, 2016 shall not be filed on the public docket.
4. The redacted version of the King Defendants' Supplemental Submission, which was publicly filed on December 28, 2016, will be withdrawn from the public docket.
5. The redacted version of the King Defendants' Appendix of Exhibits, which was publicly filed on December 28, 2016, will be withdrawn from the public docket.
6. The redacted version of the Class Representatives' Supplemental Submission (including attached exhibits), which was publicly filed on December 28, 2016, will be withdrawn from the public docket.

Dated: February 1, 2017


The Honorable Curtis E.A. Karnow
Judge of the Superior Court

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