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Attorneys for Proposed Intervenor
X CORP.

LIST OF COUNSEL CONTINUED ON SECOND
PAGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GIUSEPPE PAMPENA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

ELON R. MUSK,

Defendant.

Case No. 3:22-CV-05937-CRB

JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO SHORTEN
TIME ON X CORP.'S MOTION TO
INTERVENE UNDER RULE 24

[Civ. L.R. 6-2]

Judge: Hon. Charles R. Breyer

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Lead Counsel for Plaintiffs and the Class

Pursuant to Civil Local Rule 6-2 and the supporting Declaration of Christopher J. Boran in Support of the Joint Stipulation to Shorten Time on X Corp.’s Motion to Intervene Under Rule 24 (“Boran Decl.”), Lead Plaintiffs Nancy Price, John Garrett, and Brian Belgrave (“Plaintiffs”), Defendant Elon Musk (“Defendant”), and Proposed Intervenor X Corp. (“X Corp.”) (Plaintiffs, Defendant, and X Corp. shall collectively be referred to as the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, Plaintiffs’ Trial Witness List filed with this Court on January 27, 2026, as Appendix 2 of the Joint [Proposed] Final Pre-Trial Order [Dkt. 358], discloses that Plaintiffs plan to present testimony at trial from certain former Twitter employees, executives, directors, and legal counsel, including: (1) former CEO Parag Agrawal, (2) former CFO Ned Segal; (3) former Chief Legal Officer Vijaya Gadde; (4) former General Counsel Sean Edgett; (5) former Head of Trust & Safety Yoel Roth; (6) former M&A Integration lead Stacey Fix Conti; former Board members (7) Egon Durban, (8) Brett Taylor, and (9) Jack Dorsey; and former outside legal counsel (10) Martin Korman, (11) William Savitt, and (12) Katie Martin.

WHEREAS, Defendant Musk is the Chairman of X Corp., formerly Twitter, Inc.

WHEREAS, X Corp. believes that the scope of anticipated testimony that Plaintiffs have disclosed for each of the above witnesses will implicate Twitter’s attorney-client privileged communications and work product from 2022.

WHEREAS, such privileged information now belongs to X Corp. as a result of the 2022 merger and the express terms of the April 25, 2022 Merger Agreement.

WHEREAS, X Corp. has filed a Motion To Intervene Under Rule 24 (“Motion to Intervene”) for the limited purpose of protecting X Corp.’s privileged information in connection with the upcoming trial.

WHEREAS, Defendant Musk consents to X Corp.’s Motion to Intervene.

WHEREAS, Plaintiffs do not believe their questioning of witnesses will elicit privileged information, believe that any participation by X Corp. at or in connection with trial will unduly complicate the proceedings, and oppose X Corp.’s Motion to Intervene.

1 WHEREAS, pursuant to Civil Local Rule 7-2(a) and the Court's Scheduling Notes, the
2 Motion to Intervene would not be heard until March 6, 2026, at the earliest, which is after the
3 February 23, 2026 trial date in this action.

4 WHEREAS, the Parties agree that the Motion to Intervene should be heard before the
5 February 23, 2026 trial date.

6 WHEREAS, the Parties have conferred and stipulate and agree to accelerate the briefing
7 and hearing date on X Corp.'s Motion to allow it to be heard prior to trial.

8 WHEREAS, X Corp. has not previously sought any modification of time in this action, as
9 it is not a party.

10 WHEREAS, the accelerated briefing schedule and hearing date X Corp. requests herein will
11 have no impact on the current case schedule.

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the Parties,
13 by and through their counsel of record, that Plaintiffs' Opposition to X Corp.'s Motion shall be due
14 on or before February 10, 2026 and the motion shall be heard during the final pre-trial conference
15 set for February 17, 2026 at 2:00 p.m. No other moving, opposition or reply papers shall be
16 submitted on the Motion to Intervene.

17 **IT IS SO STIPULATED.**

18 Dated: January 30, 2026

MORGAN, LEWIS & BOCKIUS LLP

20 By /s/ Eric Meckley

21 Eric Meckley
22 Christopher Boran

23 Attorneys for Proposed Intervenor
24 X CORP.

1 Dated: January 30, 2026

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

2
3
4 By /s/ Alex Bergjans
Alex Bergjans

5 Attorneys for Defendant
6 ELON R. MUSK

7 Dated: January 30, 2026

BOTTINI & BOTTINI, INC.

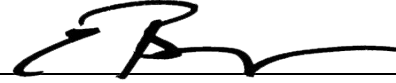
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9 By /s/ Aaron P. Arnzen
10 Aaron P. Arnzen

11 Attorneys for Plaintiffs
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 2, 2026



HONORABLE CHARLES R. BREYER
United States District Judge