

## COTCHETT, PITRE &amp; MCCARTHY, LLP

Joseph W. Cotchett (SBN 36324)  
 jcotchett@cpmlegal.com  
 Mark C. Molumphy (SBN 168009)  
 mmolumphy@cpmlegal.com  
 Tyson C. Redenbarger (SBN 294424)  
 tredenbarger@cpmlegal.com  
 Elle D. Lewis (SBN 238329)  
 elewis@cpmlegal.com  
 Gia Jung (SBN 340160)  
 gjung@cpmlegal.com  
 Caroline A. Yuen (SBN 354388)  
 cyuen@cpmlegal.com  
 San Francisco Airport Office Center  
 840 Malcolm Road, Suite 200  
 Burlingame, California 94010  
 Telephone: (650) 697-6000

## BOTTINI &amp; BOTTINI, INC.

Francis A. Bottini, Jr. (SBN 175783)  
 fbottini@bottinilaw.com  
 Aaron Arnzen (SBN 218272)  
 aarnzen@bottinilaw.com  
 7817 Ivanhoe Avenue, Suite 102  
 La Jolla, California 92037  
 Telephone: (858) 914-2001

*Attorneys for Lead Plaintiff*

## QUINN EMANUEL URQUHART &amp; SULLIVAN, LLP

Alex Spiro (*pro hac vice*)  
 alexspiro@quinnemanuel.com  
 Ellyde R. Thompson (*pro hac vice*)  
 ellydethompson@quinnemanuel.com  
 Jesse A. Bernstein (*pro hac vice*)  
 jessebernstein@quinnemanuel.com  
 295 Fifth Ave., New York, NY 10010  
 Telephone: (212) 849-7000  
 Facsimile: (212) 849-7100

Michael T. Lifrak (Bar No. 210846)  
 michaelifrak@quinnemanuel.com  
 Stephen A. Broome (Bar No. 314605)  
 stephenbroome@quinnemanuel.com  
 Alex Bergjans (Bar No. 302830)  
 alexbergjans@quinnemanuel.com  
 865 S. Figueroa Street, 10th Floor  
 Los Angeles, California 90017  
 Telephone: (213) 443-3000  
 Facsimile: (213) 443-3100

*Attorneys for Defendant Elon Musk*

## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

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

Plaintiff,

vs.

ELON R. MUSK,

Defendant.

CASE NO. 3:22-CV-05937-CRB

**STIPULATION AND ~~[PROPOSED]~~  
 ORDER ENLARGING PAGE LIMITS  
 FOR DEFENDANT'S RULE 50(B) AND 59  
 MOTIONS**

Hon. Judge Charles R. Breyer



**STIPULATION AND [PROPOSED] ORDER**

1  
2 1. Pursuant to Local Civil Rules 7-11, the Parties jointly enter into this Stipulation requesting  
3 an enlargement of the page limits as to the parties' briefing on Defendant's anticipated combined Rule  
4 50(b) renewed motion for judgment as a matter of law, and Rule 59 motion for new trial.

5 2. This Court's Standing Order I.C. provides that a brief in support or in opposition to Rule  
6 50(b) and 59 motions may not exceed fifteen pages in length without leave of the Court and good cause.

7 3. The Parties have conferred and agree that, given the number of issues and arguments that  
8 the Defendant seeks to raise through these combined motions (including argument regarding each of the  
9 five elements of Plaintiffs' 10b-5 claim and corresponding jury instructions), an additional fifteen pages  
10 is warranted for the combined motions and opposition briefs. The Court has previously expanded the page  
11 limits for other dispositive motions in this case, including the Motion to Dismiss (Dkt. No. 32), Motion  
12 for Class Certification (Dkt. No. 82), and Motion for Summary Judgment (Dkt. No. 232), on similar  
13 grounds.

14 NOW, THEREFORE, IT IS HEREBY STIPULATED AND THE PARTIES JOINTLY  
15 REQUEST that the Court extend the page limits for Defendant's combined Rule 50(b) and 59 Motions  
16 and Plaintiffs' Opposition to Defendant's Motions, each to thirty pages, not including, title pages, indexes  
17 of cases, table of contents, exhibits, affidavits and summaries of argument. Defendant's Reply Brief in  
18 Support of the Motions for judgment as a matter of law and for new trial shall have a page limit of fifteen  
19 pages.

1 DATED: April 17, 2026

2 /s/ Alex Spiro

3 QUINN EMANUEL URQUHART &  
4 SULLIVAN, LLP

5 Alex Spiro (pro hac vice)

6 alexspiro@quinnemanuel.com

7 Jesse A. Bernstein (pro hac vice)

8 jessebernstein@quinnemanuel.com

9 Stephanie Keleman (*pro hac vice*)

10 stephaniekeleman@quinnemanuel.com

11 51 Madison Ave 22nd floor

12 New York, NY 10010

13 Telephone: (212) 849-7000

14 Facsimile: (212) 849-7100

15 Michael T. Lifrak (Bar No. 210846)

16 michaellifrak@quinnemanuel.com

17 Joseph C. Sarles (Bar No. 254750)

18 josephsarles@quinnemanuel.com

19 Alex Bergjans (Bar No. 302830)

20 alexbergjans@quinnemanuel.com

21 865 S. Figueroa Street, 10th Floor

22 Los Angeles, California 90017

23 Telephone: (213) 443-3000

24 Facsimile: (213) 443-3100

25 *Attorneys for Defendant Elon Musk*

/s/ Joseph W. Cotchett

COTCHETT, PITRE & MCCARTHY, LLP

Joseph W. Cotchett (SBN 36324)

jcotchett@cpmlegal.com

Mark C. Molumphy (SBN 168009)

mmolumphy@cpmlegal.com

Tyson C. Redenbarger (SBN 294424)

tredenbarger@cpmlegal.com

Elle D. Lewis (SBN 238329)

elewis@cpmlegal.com

Gia Jung (SBN 340160)

gjung@cpmlegal.com

Caroline A. Yuen (SBN 354388)

cyuen@cpmlegal.com

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, California 94010

Telephone: (650) 697-6000

/s/ Francis A. Bottini

BOTTINI & BOTTINI, INC.

Francis A. Bottini, Jr. (SBN 175783)

fbottini@bottinilaw.com

Aaron Arnzen (SBN 218272)

aarnzen@bottinilaw.com

7817 Ivanhoe Avenue, Suite 102

La Jolla, California 92037

Telephone: (858) 914-2001

*Attorneys for Lead Plaintiffs*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Alex Bergjans, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17 day of April 2026, at Los Angeles, California.

By /s/ Alex Bergjans  
Alex Bergjans

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 22, 2026

