

## GRANTED

EFiled: Oct 28 2015 07 00PM EDT Transaction ID 58083696 Case No. Multi Case

## IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

RONNIE TAYLOR, On Behalf of Himself and All Others Similarly Situated,	
Plaintiff, )	
v. )	C.A. No. 11506-VCN
CAMERON INTERNATIONAL )	
CORPORATION, JACK B. MOORE, H.	
PAULETT EBERHART, PETER J. FLUOR, )	
DOUGLAS L. FOSHEE, JAMES T. )	
HACKETT, RODOLFO LANDIM,	
MICHAEL E. PATRICK, TIMOTHY J. )	
PROBERT, JON ERIK REINHARDSEN, R. )	
SCOTT ROWE, BRENT J. SMOLIK,	
BRUCE W. WILKINSON,	
SCHLUMBERGER HOLDINGS )	
CORPORATION, RAIN MERGER SUB )	
LLC, SCHLUMBERGER N.V., and	
SCHLUMBERGER LIMITED, )	
Defendants.	

BERNARD ARTZT, individually and on behalf of all others similarly situated,	
)	
Plaintiff, )	
v. )	C.A. No. 11514-VCN
JACK B. MOORE, R. SCOTT ROWE, H. PAULETT EBERHART, PETER J. FLOUR, DOUGLAS L. FOSHEE, JAMES T. HACKETT, RODOLFO LANDIM, MICHAEL E. PATRICK, TIMOTHY J. PROBERT, JON ERIK REINHARDSEN, BRENT J. SMOLIK, BRUCE W. WILKINSON, CAMERON INTERNATIONAL CORPORATION, SCHLUMBERGER N.V., SCHLUMBERGER HOLDINGS CORPORATION, and RAIN MERGER SUB LLC,	
Defendants. )	

DENNIS WEEKS, Individually and On	)
Behalf of All Others Similarly Situated,	)
	)
Plaintiff,	)
,	)
V.	)
	C.A. No. 11542-VCN
JACK B. MOORE, H. PAULETT	)
EBERHART, PETER J. FLUOR, DOUGLAS	)
L. FOSHEE, JAMES T. HACKETT,	)
RODOLFO LANDIM, MICHAEL E.	)
PATRICK, TIMOTHY J. PROBERT, JON	)
ERIK REINHARDSEN, R. SCOTT ROWE,	)
BRENT J. SMOLIK, BRUCE W.	)
WILKINSON, CAMERON	)
INTERNATIONAL CORPORATION,	)
SCHLUMBERGER HOLDINGS	)
CORPORATION, RAIN MERGER SUB	)
LLC, SCHLUMBERGER N.V., and	)
SCHLUMBERGER LIMITED,	)
	)
Defendants.	)
	)

BRENDAN FOOTE, on Behalf of Himself	)
and All Others Similarly Situated,	)
	)
Plaintiff,	)
v.	C.A. No. 11562-VCN
	)
JACK B. MOORE, R. SCOTT ROWE,	)
MICHAEL E. PATRICK, BRUCE W.	)
WILKINSON, PETER J. FLUOR,	)
DOUGLAS L. FOSHEE, JON ERIK	)
REINHARDSEN, RODOLFO LANDIM, H.	)
PAULETT EBERHART, BRENT J.	)
SMOLIK, TIMOTHY J. PROBERT, JAMES	)
T. HACKETT, SCHLUMBERGER	)
HOLDINGS CORPORATION, RAIN	)
MERGER SUB LLC, and	)
SCHLUMBERGER N.V.,	)
	)
Defendants.	)
	)

## [PROPOSED] ORDER FOR CONSOLIDATION AND APPOINTMENT OF CO-LEAD COUNSEL

It appearing that the above-captioned actions involve the same subject matter and that the administration of justice would be best served by consolidating the actions,

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_\_, 2015:

- 1. The above-captioned actions shall be consolidated for all purposes and are referred to herein as the "Consolidation Action."
  - 2. Hereafter, papers need only be filed in Civil Action No. 11506-VCN.
  - 3. The consolidated case caption shall be:

IN RE CAMERON INTERNATIONAL ) CONSOLIDATED CORP. STOCKHOLDERS LITIGATION ) C.A. No. 11506-VCN

4. The law firms of ROBBINS ARROYO LLP, 600 B Street, Suite 1900, San Diego, CA 92101 and RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, DE 19803 are designated as Co-Lead Counsel for Plaintiffs.

- 5. The law firms of THEGRANTLAWFIRM, PLLC, 521 Fifth Avenue, 17th Floor, New York, NY 10175 and LEVI & KORSINSKY, LLP, 733 Summer Street, Suite 304, Stamford, CT 06901 are designated as the Executive Committee for Plaintiffs.
- 6. The law firm of RIGRODSKY & LONG, P.A. is designated as Delaware Counsel for Plaintiffs.
- 7. All documents previously filed to date in any of the cases consolidated herein are deemed part of the record in the Consolidated Action. As soon as practicable, plaintiffs will file an amended consolidated complaint, or designate an operative complaint. Defendants need not respond to any of the complaints currently pending in the constituent actions. The First Request for Production of Documents to the Individual Defendants served in *Foote v. Moore*, C.A. No 11562-VCN is hereby designated the operative discovery requests.

- 8. Co-Lead Counsel for Plaintiffs shall set policy for plaintiffs for the prosecution of this litigation, ensure that there is no duplication of effort or unnecessary expense, coordinate on behalf of plaintiffs the initiation and conduct of discovery proceedings, provide direction, supervision and coordination of all activities of plaintiffs' counsel, and have the authority to negotiate a settlement, subject to approval of plaintiffs and the Court. Any agreement reached between counsel for defendants and Co-Lead Counsel for Plaintiffs shall be binding on the other Co-Lead Counsel and plaintiffs.
- 9. Co-Lead Counsel for Plaintiffs shall assume the following powers and responsibilities:
  - a. coordinate and direct the preparation of pleadings;
  - b. coordinate and direct the briefing and argument of motions;
- c. coordinate and direct the conduct of discovery and other pretrial proceedings;
  - d. coordinate and direct class certification proceedings;
- e. coordinate the selection of counsel to act as the plaintiffs' spokesperson at pretrial conferences;
- f. call meetings of plaintiffs' counsel as they deem necessary and appropriate from time to time;

- g. conduct any and all settlement negotiations with counsel for the defendants;
- h. coordinate and direct the preparation for trial and trial of this matter, and delegate work responsibilities to selected counsel as may be required; and
- i. coordinate and direct any other matters concerning the prosecution or resolution of the consolidated action.
- 10. Delaware Counsel shall be responsible for coordinating all activities and appearances on behalf of plaintiffs and for the dissemination of notices and orders of this Court, as well as for communications to and from this Court. No motion, request for discovery, or other pretrial or trial proceedings shall be initiated or filed by any plaintiffs except through Delaware Counsel.
- 11. This Order shall apply to this Consolidated Action and any future-filed actions relating to the subject matter of this case. When a case that properly belongs as part of the Consolidated Action is hereafter filed in the Court, this Court requests the assistance of counsel in calling to the attention of the Court the filing of any case which might properly be consolidated as part of the Consolidated Action, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

Vice Chancellor	
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This document constitutes a ruling of the court and should be treated as such.

Court: DE Court of Chancery Civil Action

Judge: Multi-Case

File & Serve

**Transaction ID:** 58074200

Current Date: Oct 28, 2015

Case Number: Multi-Case

Case Name: Multi-Case

Court Authorizer: Noble, John

/s/ Judge Noble, John