



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

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LUCIANO SCOTTO, Individually on Behalf of Himself, and All Others Similarly Situated,	) ) )
Plaintiff,	)
	) C.A. No. 10913-VCL
V.	)
SOHAIB ABBASI, MARK A. BERTELSEN, AMY CHANG, MARK GARRETT, GERALD HELD, PH.D, HILARIE KOPLOW-MCADAMS, CHARLES ROBEL, A. BROOKE SEAWELL, GEOFFREY W. SQUIRE, ITALICS INC., and ITALICS MERGER SUB INC.,	) ) ) ) ) ) )
Defendants.	) )
JANICE RIDGEWAY, On Behalf of Herself and All Others Similarly Situated, Plaintiff,	- ) ) )
V.	)
INFORMATICA CORPORATION, SOHAIB ABBASI, MARK A. BERTELSEN, AMY CHANG, MARK GARRETT, GERALD HELD, HILARIE KOPLOW-MCADAMS, CHARLES ROBEL, A. BROOKE SEAWELL, GEOFFREY W. SQUIRE, PERMIRA ADVISERS LLC, CANADA PENSION PLAN INVESTMENT BOARD, ITALICS INC., and ITALICS MERGER SUB INC.,	) C.A. No. 10917-VCL ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) )

## [PROPOSED] ORDER OF CONSOLIDATION AND APPOINTMENT OF CO-LEAD COUNSEL AND LIAISON 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 (the "Consolidated Action").

2. Hereafter, papers need only be filed in Civil Action No. 10913-VCL.

3. The caption of the Consolidated Action shall be as follows:

## IN RE INFORMATICA CORPORATION)CONSOLIDATEDSTOCKHOLDER LITIGATION)C.A. No. 10913-VCL

4. The law firms of RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, DE 19803 and MILBERG LLP, One Penn Plaza, 49<sup>th</sup> Floor, New York, NY 10019 are designated as Co-Lead Counsel for Plaintiffs. The law firm of RIGRODSKY & LONG, P.A., 2 Righter Parkway, Suite 120, Wilmington, DE 19803 is designated as Liaison Counsel for Plaintiffs.

5. 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. Defendants need not respond to any of the complaints currently pending in the constituent actions.

6. Co-Lead Counsel for Plaintiffs, in consultation with Liaison Counsel, 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.

7. Co-Lead Counsel for Plaintiffs, in consultation with Liaison Counsel, 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;

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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.

8. Liaison 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 Liaison Counsel.

9. This Order shall apply to this Consolidated Action and any futurefiled 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

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Action, and counsel are to assist in assuring that counsel in subsequent actions receive notice of this Order.

Vice Chancellor

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:	57178065	
Current Date:	May 05, 2015	
Case Number:	Multi-Case	
Case Name:	Multi-Case	
Court Authorizer:	Laster, J Travis	
/s/ Judge Laster, J Travis		