

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS: COMMERCIAL DIVISION**

)	Master Index No. 711788/2018
IN RE ALTICE USA, INC. SECURITIES)	(Hon. Joseph Risi)
LITIGATION)	
)	
)	

**STIPULATION AND [PROPOSED] ORDER PROVIDING A SCHEDULE FOR
THE FILING OF AND RESPONSE TO PLAINTIFFS’ MOTION TO AMEND
THE CONSOLIDATED COMPLAINT**

WHEREAS, on June 27, 2019, Co-Lead Plaintiffs Ryan Newman, Brian LaPoint, and Andrew O’Neill (collectively, “Plaintiffs”) filed their Consolidated Amended Complaint for Violations of the Securities Act of 1933 (“Consolidated Complaint”) for claims arising from Altice USA, Inc.’s (“Altice USA”) initial public offering (“IPO”), asserting claims against Altice USA, certain of its current and former officers and directors, Patrick Drahi, Altice Europe N.V., and the underwriters of the IPO (collectively, “Defendants” and with Plaintiffs, the “Parties”);

WHEREAS, on July 19, 2019, Plaintiffs served their First Request for the Production of Documents Directed to Altice USA (“Requests”);

WHEREAS, on July 23, 2019, Defendants filed a motion to dismiss the Consolidated Complaint (NYSCEF Doc. No. 80); Plaintiffs filed their Opposition to Defendants’ motion to dismiss on August 6, 2019 (NYSCEF Doc. No. 92); and Defendants filed their Reply in further support of their motion to dismiss on August 12, 2019 (NYSCEF Doc. No. 93);

WHEREAS, on October 29, 2019, following meet and confer negotiations, the Parties reached a compromise agreement whereby Defendant Altice USA would produce certain categories of documents responsive to the Requests, and in exchange, Plaintiffs would defer, until after resolution of Defendants’ motion to dismiss, any efforts to obtain additional documents in response to the Requests;

WHEREAS, on January 10, 2020, Plaintiffs filed the Stipulation and Order for the Production and Exchange of Confidential Information governing the production of confidential documents and information in this case (NYSCEF Doc. No. 115);

WHEREAS, on March 5, 2020, the Court so-ordered the Stipulation and Order for the Production and Exchange of Confidential Information governing the production of confidential documents and information in this case (NYSCEF Doc. No. 116);

WHEREAS, on April 3, 2020, Defendants made an initial production of documents in response to the Requests;

WHEREAS, on June 26, 2020, the Court granted Defendants' motion to dismiss;

WHEREAS, on June 26, 2020, Plaintiffs filed a motion to (1) Modify the Court's June 26, 2020 Order to Allow Plaintiffs to File a Further Amended Complaint (or a Motion for Leave to File Such a Further Amended Complaint) Within 45 Days; and (2) Delay Entry of Final Judgement Pending Opportunity to File Amended Complaint (NYSCEF Doc. 120);

WHEREAS, Plaintiffs have indicated their intention to file a superseding Motion for Leave to File a First Amended Consolidated Complaint, pursuant to Civil Practice Law & Rule §3025 (b), which would attach a copy of any [Proposed] First Amended Consolidated Complaint (the "Motion"), and Defendant Altice USA has indicated its intention to complete its production of documents pursuant to the Parties' prior compromise agreement;

WHEREAS, in light of the foregoing, the Parties have met and conferred and agreed to the following schedule;

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, as follows:

1. Defendant Altice USA shall complete its production of documents pursuant to the Parties' prior compromise agreement on or before August 14, 2020;
2. Plaintiffs shall file any superseding Motion, together with a copy of any [Proposed] First Amended Consolidated Complaint, on or before September 4, 2020;
3. Defendants will file their Opposition to Plaintiffs' Motion, if any, on or before October 2, 2020;
4. Plaintiffs will file their Reply in further support of their Motion, if any, on or before October 23, 2020;
5. The return date on Plaintiffs' Motion shall be October 27, 2020 or another time that is convenient for the Court; and
6. An electronic signature on this Stipulation will be considered an original.

Dated: August 13, 2020
New York, New York

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SO ORDERED.

Dated: _____, 2020

HON. JOSEPH RISI, J.S.C.