

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge John L. Kane**

Master Docket No. **09-md-02063-JLK-KMT** (MDL Docket No. 2063)

**IN RE: OPPENHEIMER ROCHESTER FUNDS GROUP SECURITIES
LITIGATION**

This document relates to: *In re California Municipal Fund*

09-cv-01848-JLK-KMT (Lowe)
09-cv-01485-JLK-KMT (Rivera)
09-cv-01486-JLK-KMT (Tackmann)
09-cv-01487-JLK-KMT (Milhem)

**STIPULATION AND ORDER REGARDING SCHEDULE FOR
CLASS NOTICE AND EXPERT DISCOVERY**

This Stipulation and proposed Order is made and entered into between Plaintiff Joseph Stockwell (“Plaintiff”) on behalf of the class of all persons and entities who, between September 27, 2006 and November 28, 2008, purchased A, B and C shares of Oppenheimer California Municipal Bond Fund pursuant or traceable to the Fund’s offering documents (the “Class”) and Defendants OppenheimerFunds, Inc., OppenheimerFunds Distributor, Inc., John V. Murphy, Brian W. Wixted, Ronald H. Fielding, Daniel G. Loughran, Scott Cottier, Troy E. Willis, Massachusetts Mutual Life Insurance Company, Oppenheimer California Municipal Fund, David K. Downes, Matthew P. Fink, Robert G. Galli, Phillip A. Griffiths, Mary F. Miller, Joel W. Motley, Kenneth A. Randall, Russell S. Reynolds, Jr., Joseph M. Wikler, Peter I. Wold, Brian F. Wruble and Clayton K. Yeuter (collectively, the “Defendants”), by and through their undersigned counsel.

WHEREAS, on October 16, 2015, the Court entered an Order granting class certification (the “Order”);

WHEREAS, the Order directed the parties to confer about, and Plaintiff to file a statement regarding, “a proposed schedule for dissemination of notice to the Class in accordance with Federal Rule of Civil Procedure 23(c)(2), taking into account any appeals that may be filed pursuant to Rule 23(f);”

WHEREAS, the parties have conferred in accordance with the Order and Defendants have stated that they will file with the Tenth Circuit a petition for permission to appeal the Court’s Order pursuant to Federal Rule of Civil Procedure 23(f);

WHEREAS, to disseminate notice to the Class, Plaintiff must prepare a draft notice, as well as a plan and schedule for its dissemination and therefore requires information from Defendants concerning the identities of Class members;

WHEREAS, in the interests of efficiency and preservation of resources, the Parties believe that it makes sense to file with the Court the notice and the plan and schedule for its dissemination shortly after the resolution of Defendants' Rule 23(f) petition and any appeal that may follow from a grant of that petition;

WHEREAS, under the current schedule rebuttal expert reports must be served no later than November 12, 2015;

WHEREAS, Defendants have requested and Plaintiff has, subject to this Court's approval, agreed to a brief extension of this deadline to November 20, 2015;

WHEREFORE, Plaintiff and Defendants hereby stipulate and agree as follows:

1. Plaintiff will seek the Court's approval of his draft notice, as well as a plan and schedule for its dissemination, within 14 days of resolution of Defendants' Rule 23(f) petition and any appeal that may follow from a grant of that petition;

2. In the interim, the parties will continue to meet and confer regarding Defendants' provision of Class member contact information to Plaintiff or his designated claims administrator and Plaintiff's draft notice and plan and schedule for dissemination. If the parties are unable to resolve any differences that may arise they may seek the Court's guidance during the pendency of Defendants' Rule 23(f) petition;

3. The parties will have until November 20, 2015 to serve rebuttal expert reports pursuant to Rule 26(a)(2).

Dated: October 30, 2015

/s/ Alan W. Sparer
Alan W. Sparer
Marc Haber
Michael L. Gallo
Sparer Law Group
1090 Pine Street, 33rd Floor
San Francisco, CA 94111
Tel: (415) 217-7300
Fax: (415) 217-7307
asparer@sparerlaw.com

Lead Class Counsel

Dated: October 30, 2015

/s/ Daniel C. Girard
Daniel C. Girard
Amanda M. Steiner
Dena C. Sharp
Elizabeth A. Kramer
Girard Gibbs LLP
601 California Street, 14th Floor
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dc@girardgibbs.com

Class Counsel

Dated: October 30, 2015

/s/ Matthew L. Larrabee

Matthew L. Larrabee
1095 Avenue of the Americas
New York, NY 10036
Tel: (212) 698-3500
Fax: (212) 698-3599
Email: matthew.larrabee@dechert.com

*Attorneys for Defendants
OppenheimerFunds, Inc.,
OppenheimerFunds Distributor, Inc.,
Scott Cottier, Ronald H. Fielding,
Daniel G. Loughran, John V. Murphy,
Troy Willis, Brian W. Wixted, and
Massachusetts Mutual Life Insurance
Company*

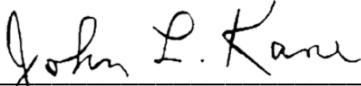
Dated: October 30, 2015

/s/ Arthur H. Aufses III

Arthur H. Aufses III
Scott Ruskay-Kidd
1177 Avenue of the Americas
New York, NY 10036
Tel: (212) 715-9100
Fax: (212) 715-8000
Email: aaufses@kramerlevin.com
sruskaykidd@kramerlevin.com

*Attorneys for Defendants
David K. Downes, Matthew P. Fink,
Robert G. Galli, Phillip A. Griffiths, Mary
F. Miller, Joel W. Motley, Kenneth A.
Randall, Russell S. Reynolds, Jr., Joseph
M. Wikler, Peter I. Wold, Brian F. Wruble,
Clayton K. Yeutter, and the Oppenheimer
California Municipal Fund*

APPROVED AND SO ORDERED this 2nd day of November, 2015.



John L. Kane
Senior U.S. District Court Judge