

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE SOLARWINDS CORPORATION
SECURITIES LITIGATION

Case No. 1:21-cv-00138-RP

**JOINT NOTICE OF SETTLEMENT
AND STIPULATION REGARDING CASE DEADLINES**

The Parties, by and through their undersigned attorneys of record, submit the following Joint Notice of Settlement and Stipulation Regarding Case Deadlines:

WHEREAS, the Parties have executed a term sheet memorializing their agreement in principle to resolve all claims in this litigation on a class-wide basis, subject to definitive documentation and the Court's approval (the "Settlement");

WHEREAS, the Parties are diligently working to document the Settlement;

WHEREAS, following the documentation of the Settlement, Lead Plaintiff will file a motion for preliminary approval of the Settlement;

WHEREAS, the Parties believe that the Settlement will be documented, and Lead Plaintiff will be in a position to file its motion for preliminary approval of the Settlement by December 8, 2022; and

WHEREAS, in light of the Settlement and Lead Plaintiff's forthcoming motion for preliminary approval of the Settlement, the Parties respectfully request the adjournment, at this time, of all pending case deadlines.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel, subject to approval of the Court, that:

1. All pending case deadlines are adjourned at this time; and
2. Lead Plaintiff shall file its motion for preliminary approval of the Settlement by no later than December 8, 2022.
3. To the extent the Settlement is not finalized for any reason, the Parties shall revert to their respective positions in this action as of immediately prior to the agreement in principle reached on October 26, 2022.

IT IS SO STIPULATED this 3rd day of November 2022.

Respectfully submitted,

AGREED:

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CERTIFICATE OF SERVICE

I certify that on November 3, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF Filing System on all parties in this case.

/s/ Michael J. Biles

Michael J. Biles

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**[PROPOSED] ORDER GRANTING JOINT STIPULATION
REGARDING CASE DEADLINES**

The Parties' Notice of Settlement and Joint Stipulation Regarding Deadlines (the "Joint Stipulation"), having been considered, and good cause appearing therefore, it is hereby ORDERED as follows:

1. The relief sought in the Joint Stipulation is GRANTED.
2. All pending case deadlines are adjourned at this time.
3. Lead Plaintiff shall file its motion for preliminary approval of the Settlement by no later than December 8, 2022.
4. To the extent the Settlement is not finalized for any reason, the Parties shall revert to their respective positions in this action as of immediately prior to the agreement in principle reached on October 26, 2022.

IT IS SO ORDERED.

DATED this ____ day of November 2022.

ROBERT PITMAN
UNITED STATES DISTRICT JUDGE