

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PETER LEUNG, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

BLUEBIRD BIO, INC., NICK LESCHLY,
and CHIP BAIRD,

Defendants.

Case No.: 1:21-cv-10335-DJC

**JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
SCHEDULE FOR (1) AMENDED
COMPLAINT; (2) DEFENDANTS'
RESPONSE; AND (3) SUBSEQUENT
BRIEFING**

CLASS ACTION

Lead Plaintiff Jerry R. Hannah (“Plaintiff”) and Defendants bluebird bio, Inc., Nick Leschly, and Chip Baird (“Defendants”), by and through their undersigned counsel, hereby agree and jointly proposed this stipulation.

WHEREAS, on February 12, 2021, Peter Leung filed a putative class action against Defendants arising under the Securities Exchange Act of 1934, including the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4, which sets forth special procedures for the administration of securities class actions, including a specific process for the appointment of a lead plaintiff and for lead counsel to represent the lead plaintiff;

WHEREAS, on February 26, 2021, this action was transferred from the United States District Court for the Eastern District of New York to this Court;

WHEREAS, on April 13, 2021, Plaintiff moved for appointment as Lead Plaintiff and approval of Plaintiff’s selection of The Rosen Law Firm, P.A. as Lead Counsel for Plaintiff and the Class (“Lead Plaintiff Motion,” Dkt. No. 14);

WHEREAS, on May 5, 2021, the Court granted Plaintiff's Lead Plaintiff Motion (Dkt. No. 22);

WHEREAS, Plaintiff intends to file an amended complaint which will become the operative complaint in this action;

WHEREAS, counsel for the Plaintiff and counsel for Defendants have conferred and agreed that in the interests of judicial economy, conservation of time and resources, and orderly management of the above-captioned actions, the following is an appropriate schedule for the filing of an amended complaint and Defendants' responses thereto;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendants, that:

1. Defendants are not required to respond to the existing complaint in this action (Dkt. No. 1);
2. Plaintiff will file an amended complaint on or by July 6, 2021;
3. Defendants will move to dismiss or otherwise respond to the amended complaint on or by September 7, 2021;
4. If Defendants move to dismiss the amended complaint, (1) Plaintiff will file his opposition to Defendants' motion to dismiss on or by October 22, 2021; and (2) Defendants will file their reply on or by November 22, 2021.

Dated: May 13, 2021

THE ROSEN LAW FIRM, P.A.

/s/ Joshua Baker

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Lead Counsel for Lead Plaintiff and the Class

Dated: May 13, 2021

GOODWIN PROCTER LLP

/s/ Deborah S. Birnbach
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Counsel for Defendants

SO ORDERED.

Dated: _____

HON. DENISE J. CASPER
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2021, a true and correct copy of the foregoing JOINT STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR (1) AMENDED COMPLAINT; (2) DEFENDANTS' RESPONSE; AND (3) SUBSEQUENT BRIEFING was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Joshua Baker
Joshua Baker