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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

LPL FINANCIAL LLC,
Plaintiff,

v.

AMERIPRISE FINANCIAL
SERVICES, LLC,
Defendant.

Case No. ~~3:25-cv-00880-JO-MSB~~

~~[PROPOSED]~~ STIPULATED ORDER

WHEREAS, the Court Ordered the Parties to meet and confer in relation to LPL’s filing of a motion for Temporary Restraining Order (“TRO”).

THEREFORE, the Parties agree to the following plan, which the Court SO ORDERS:

1. LPL agrees to dismiss this Federal Court Action with prejudice on or before May 9, 2025. Parties agree that LPL has the right to pursue substantive claims for defamation and tortious interference in FINRA. Ameriprise reserves the right to seek attorneys’ fees in FINRA.

2. LPL agrees to provide a list of Non-Customers of LPL whose information was provided via the Bulk Upload Tool (the LPL List) to Ameriprise

1 within one week. Ameriprise subsequently agrees to provide a list of individuals who
2 are not on the LPL List who were sent a data breach notification to LPL within two
3 weeks of receipt of the LPL List. This item will be for in-house and outside counsel
4 attorneys' eyes only, to the extent non-attorneys see either list, they will do so under
5 the direction of counsel.

6 3. LPL will provide forty-eight hours' notice and a copy to Ameriprise of
7 any LPL notice to clients regarding the data breach notice for review and comments.
8 In response to LPL's notice, Ameriprise will provide forty-eight hours' notice and a
9 copy to LPL of any response notice Ameriprise intends to send.

10 4. The Court shall maintain jurisdiction over this Stipulated Order and its
11 enforcement concurrent with the FINRA arbitration Panel in FINRA Arbitration No.
12 24-01643.

13 *5. Based on the parties' stipulation, this case*
14 *is DISMISSED with prejudice. The Court orders the*
15 *Clerk of the Court to CLOSE this case. (TW)*

16 DATED: May 8, 2025

By: s/Jeffrey K. Compton

17 Jeffrey K. Compton
18 Attorneys for Plaintiff LPL FINANCIAL
19 LLC

SHUMAKER, LOOP & KENDRICK, LLP

20 DATED: May 8, 2025

By: s/Michael S. Taaffe

21 Michael S. Taaffe
22 Attorneys for Defendant AMERIPRISE
23 FINANCIAL SERVICES, LLC

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26 (signatures continued on next page)
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