



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

ROBERT SCHWARZ,

Plaintiff,

v.

C.A. No. 2023-0418-JTL

K. RUPERT MURDOCH, *et al.*,

Defendants.

JULIE R. GREENBERG, *et al.*,

Plaintiffs,

v.

C.A. No. 2023-0440-JTL

K. RUPERT MURDOCH, *et al.*,

Defendants.

**STIPULATION AND [PROPOSED] ORDER CONSOLIDATING
ACTIONS AND GOVERNING FUTURE COMPLAINTS
AND LEADERSHIP APPLICATIONS**

WHEREAS, on April 11, 2023, Plaintiff Robert Schwarz filed a Verified Derivative Complaint against K. Rupert Murdoch, Lachlan K. Murdoch, Chase Carey, Roland A. Hernandez, Jacques Nasser, and Fox Corporation in the action styled *Schwarz v. Murdoch, et al.*, C.A. No. 2023-0418-JTL (the “Schwarz Action”);

WHEREAS, on April 18, 2023, Fox Corporation agreed to pay \$787.5 million to settle claims brought by US Dominion, Inc. and certain affiliates;

WHEREAS, on April 19, 2023, Labaton Sucharow LLP, Bernstein Litowitz Berger & Grossmann LLP, and Friedman Oster & Tejtel PLLC entered their appearance on behalf of unidentified clients;

WHEREAS, on April 20, 2023, Plaintiffs Julie R. Greenberg, as Trustee of The Julie R. Greenberg Revocable Trust U/A dated 05/07/10 and Carylin Riak filed a Verified Stockholder Derivative Complaint against Defendants K. Rupert Murdoch, Lachlan K. Murdoch, Charles G. “Chase” Carey, Jacques A. Nasser, Anne Dias, Roland A. Hernandez, Paul A. Ryan, and Fox Corporation in the action styled *Greenberg, et al. v. Murdoch, et al.*, C.A. No. 2023-0440-JTL (the “Greenberg Action,” and together with the Schwarz Action, the “Actions”);

WHEREAS, on June 1, 2023, Friedlander & Gorris, P.A., Cohen Milstein Sellers & Toll PLLC, and Lieff Cabraser Heimann & Bernstein, LLP, entered their appearance on behalf of the Oregon Attorney General, as chief legal counsel to the Oregon State Treasurer, on behalf of the Oregon Investment Council and the Oregon Public Employees Retirement Fund;

WHEREAS, Court of Chancery Rule 42(a) permits consolidation of actions “involving a common question of law or fact . . . pending before the Court,” and the Court may “make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay”;

IT IS HEREBY STIPULATED AND AGREED by the parties, through their undersigned counsel, and subject to the approval of the Court, as follows:

1. The Schwarz Action and Greenberg Action involve common questions of law or fact and justice can be administered more effectively as among the parties without a multiplicity of suits. Accordingly, the Schwarz Action and Greenberg Action shall be consolidated and coordinated for all purposes, including trial.

2. The caption of the consolidated action (“Consolidated Action”) shall be:

IN RE FOX CORPORATION DERIVATIVE LITIGATION
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CONSOLIDATED
C.A. No. 2023-0418-JTL

3. All papers and documents filed and served to date in each of the cases consolidated herein are deemed a part of the record in the Consolidated Action.

4. This Stipulation and Order shall apply to the Schwarz Action and Greenberg Action and any actions subsequently filed in or transferred to this Court that involve questions of law or fact similar to those contained in the Actions (each, a “Related Action”). All Related Actions shall be automatically consolidated with the Consolidated Action. When a case that properly should be consolidated with the Consolidated Action is hereafter filed in the Court, this Court requests the assistance of counsel in calling it to the attention of the Court and to assist it in ensuring that counsel in subsequent actions receive notice of this Order.

5. The following schedule shall govern future complaints and leadership applications:

(a)	Filing of operative pleading by applicant for leadership	September 12, 2023
(b)	Filing of leadership application of 3,000 words or less	September 21, 2023
(c)	Filing of response by applicant for leadership of 3,000 words or less	October 5, 2023
(d)	Hearing on leadership applications	____, 2023, at __.m.

6. Following the filing of any complaint, papers need only be filed in C.A. No. 2023-0418-JTL.

7. All motions and any related papers that refer to material designated by Fox Corporation as containing confidential material may be filed as Confidential Filings under Court of Chancery Rule 5.1.

8. This Order shall apply to any future-filed actions concerning the subject matter of the above-captioned actions.

FRIEDLANDER & GORRIS, P.A.

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DATED: August 28, 2023

SO ORDERED this ____ day of _____, 2023.

Vice Chancellor J. Travis Laster

Multi-Case Filing Detail: The document above has been filed and/or served into multiple cases, see the details below including the case number and name.

Transaction Details

Court: DE Court of Chancery Civil Action	Document Type: Stipulation & (Proposed) Order
Transaction ID: 70751486	Document Title: Stipulation and [Proposed] Order Consolidating Actions and Governing Future Complaints and Leadership Applications
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Case Details

Case Number	Case Name
2023-0418-JTL	Robert Schwarz v. K. Rupert Murdoch
2023-0440-JTL	Julie R. Greenberg, et al vs Fox Corporation, et al