

**U.S. District Court
District of New Jersey (Trenton)
CIVIL DOCKET FOR CASE #: 3:08-cv-04437-GEB-TJB**

In re SYNCHRONOSS SECURITIES LITIGATION

Date Filed: Sep. 05, 2008
Nature of suit: 850 Securities/Commodities
Assigned to: [Chief Judge Garrett E. Brown, Jr.](#)
Cause: 15:78m(a) Securities Exchange Act
Jurisdiction: Federal Question
Jury demand: Plaintiff
Member cases: 3:08-cv-04847-JAP-TJB
3:08-cv-04747-FLW-TJB
Referred to: Magistrate Judge Tonianne J. Bongiovanni

Parties and Attorneys

Lead Plaintiff

Herman Braude

Attorneys and Firms

JAMES STUART NOTIS

GARDY & NOTIS

440 SYLVAN AVENUE

SUITE 110

ENGLEWOOD CLIFFS, NJ 07632

(201) 567-7377

jnotis@gardylaw.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Lead Plaintiff

Richard Kerwick

Attorneys and Firms

JAMES STUART NOTIS

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

LAURENCE M. ROSEN

236 TILLOU ROAD

SOUTH ORANGE, NJ 07079

(973) 313-1887

lrosen@rosenlegal.com

THE ROSEN LAW FIRM, PA

LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

BARRY SCHUTSKY

Attorneys and Firms

ARIANA J. TADLER

MILBERG LLP

ONE PENNSYLVANIA PLAZA

NEW YORK, NY 10119

(212) 594-5300

atadler@milberg.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

JAMES STUART NOTIS

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

TODD LESLIE KAMMERMAN

MILBERG LLP

ONE PENNSYLVANIA PLAZA

NEW YORK, NY 10119

(212) 549-5300

tkammerman@milberg.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Plaintiff

JEFFREY L. ORNOFF

Individually and On Behalf of All Others Similarly Situated

Attorneys and Firms

JOSEPH J. DEPALMA

*LITE, DEPALMA, GREENBERG &
RIVAS, LLC*

TWO GATEWAY CENTER

12TH FLOOR

NEWARK, NJ 07102-5003

(973) 623-3000

jdepalma@ldgrlaw.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Plaintiff

THEODORE E. BEATON

Individually and On Behalf of All Others Similarly Situated

Attorneys and Firms

LAURENCE M. ROSEN

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant

SYNCHRONOSS, INC.

Attorneys and Firms

BRIAN J. MCMAHON

GIBBONS, PC

ONE GATEWAY CENTER

NEWARK, NJ 07102-5310
(973) 596-4500
bmcMahon@gibbonslaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
JESSICA SARA BOAR
BINGHAM MCCUTCHEN, LLC
399 PARK AVENUE
NEW YORK, NY 10022
(212) 705-7258
jessica.boar@bingham.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

STEPHEN G. WALDIS

Attorneys and Firms

BRIAN J. MCMAHON

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
JESSICA SARA BOAR
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

LAWRENCE R. IRVING

Attorneys and Firms

BRIAN J. MCMAHON

(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED
JESSICA SARA BOAR
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Docket Proceedings[Reverse Proceedings](#)

Req #	Filed	#	Docket Text
1	Sep. 05, 2008	1	COMPLAINT against SYNCHRONOSS, INC., STEPHEN G. WALDIS, LAWRENCE R. IRVING (Filing fee \$ 350 receipt number 2169126.) JURY DEMAND, filed by BARRY SCHUTSKY.(kak) (Entered: 09/05/2008)
2	Sep. 05, 2008	2	Summons Issued as to SYNCHRONOSS, INC., STEPHEN G. WALDIS, LAWRENCE R. IRVING. Days Due - 20. MAILED TO ATTORNEY (kak,) (Entered: 09/05/2008)
3	Nov. 07, 2008	3	Letter from Peter Safirstein re consolidation. (SAFIRSTEIN, PETER) (Entered: 11/07/2008)
4	Nov. 07, 2008	4	MOTION to Consolidate Cases, MOTION to Appoint Lead Plaintiff and Approve Selection of Lead Counsel by Herman Braude. (Attachments: # 1 Brief in Support, # 2 Declaration of Peter Safirstein in Support, # 3 Exhibit

Req #	Filed	#	Docket Text
			A to Declaration of Peter Safirstein (early notice), # 4 Exhibit B to Declaration of Peter Safirstein (lead plaintiff certification), # 5 Exhibit C to Declaration of Peter Safirstein (loss chart), # 6 Exhibit D to Declaration of Peter Safirstein (resume), # 7 Exhibit E to Declaration of Peter Safirstein (resume), # 8 Text of Proposed Order)(NOTIS, JAMES) (Entered: 11/07/2008)
<u>5</u>	Nov. 07, 2008	5	MOTION to Appoint Counsel Rosen Law Firm Lead Attorney: Laurence Rosen., MOTION to Appoint Lead Plaintiff, MOTION to Consolidate Cases by Richard Kerwick. (Attachments: # 1 Brief In Support of Motion, # 2 Declaration of Laurence Rosen in Support, # 3 Exhibit 1, To Rosen Decl., Early Notice, # 4 Exhibit 2, To Rosen Decl., PSLRA Certification, # 5 Exhibit 3, To Rosen Declaration, Loss Chart, # 6 Exhibit 4, To Rosen Declaration, Rosen Law Firm Biography, # 7 Text of Proposed Order)(ROSEN, LAURENCE) (Entered: 11/07/2008)
<u>6</u>	Nov. 10, 2008		Setting Deadlines as to 4 MOTION to Consolidate Cases MOTION to Appoint Lead Plaintiff and Approve Selection of Lead Counsel, 5 MOTION to Appoint Counsel Rosen Law Firm Lead Attorney: Laurence Rosen. MOTION to Appoint Lead Plaintiff MOTION to Consolidate Case. Motion set for 12/1/2008 before Judge Brown will be decided on the papers. No appearance required unless notified by the Court. (mmh) (Entered: 11/10/2008)
<u>7</u>	Nov. 17, 2008	6	BRIEF in Opposition re 5 MOTION to Appoint Counsel Rosen Law Firm Lead Attorney: Laurence Rosen. MOTION to Appoint Lead Plaintiff MOTION to Consolidate Cases filed by Herman Braude. (Attachments: # 1 Declaration of Roland Riggs (with exhibits))(NOTIS, JAMES) (Entered: 11/17/2008)
<u>8</u>	Nov. 17, 2008	7	BRIEF in Opposition re 4 MOTION to Consolidate Cases MOTION to Appoint Lead Plaintiff and Approve Selection of Lead Counsel filed by Richard Kerwick. (Attachments: # 1 Declaration Of Laurence Rosen, # 2 Exhibit 1, To Rosen Declaration)(ROSEN, LAURENCE) (Entered: 11/17/2008)
<u>9</u>	Nov. 17, 2008	8	ORDER consolidating Cv. 08-4847 & Cv. 08-4747 with this action; dsignating the matter as In re: SYNCHRONOSS SECURITIES LITIGATION; consolidating certain parties; directing parties to file certain appearances and motions within 30 days of this order. Signed by Chief Judge Garrett E. Brown, Jr. on 11/17/08. (lk) (Entered: 11/20/2008)
<u>10</u>	Dec. 05, 2008	9	MOTION to Appoint Lead Plaintiff and Lead Counsel by Herman Braude, Richard Kerwick. (Attachments: # 1 Brief in Support, # 2 Declaration of James S. Notis in Support, # 3 Exhibit A to the Declaration of James S. Notis (early notice), # 4 Exhibit B to the Declaration of James S. Notis (lead plaintiff certification), # 5 Exhibit C to the Declaration of James S. Notis (lead plaintiff certification), # 6 Exhibit D to the Declaration of James S. Notis (resume), # 7 Exhibit E to the Declaration of James S. Notis (resume), # 8 Exhibit F to the Declaration of James S. Notis (resume), # 9 Text of Proposed Order)(NOTIS, JAMES) (Entered: 12/05/2008)
<u>11</u>	Dec. 08, 2008		Set Deadlines as to 9 MOTION to Appoint Lead Plaintiff and Lead Counsel. Motion set for 1/5/2009 before Chief Judge Garrett E. Brown, Jr.. The motion will be decided on the papers. No appearances required unless notified by the court. (ss,) (Entered: 12/08/2008)

Req #	Filed	#	Docket Text
<u>12</u>	Dec. 17, 2008	10	NOTICE of Appearance by BRIAN J. MCMAHON on behalf of SYNCHRONOSS, INC., STEPHEN G. WALDIS, LAWRENCE R. IRVING (MCMAHON, BRIAN) (Entered: 12/17/2008)
<u>13</u>	Dec. 17, 2008	11	Corporate Disclosure Statement by SYNCHRONOSS, INC., STEPHEN G. WALDIS, LAWRENCE R. IRVING. (MCMAHON, BRIAN) (Entered: 12/17/2008)
<u>14</u>	Dec. 30, 2008	12	ORDER granting 4 Motion to Consolidate Cases; granting 4 Motion to Appoint Lead Plaintiff. ; granting 5 Motion to Appoint Counsel ; granting 5 Motion to Appoint Lead Plaintiff. ; granting 5 Motion to Consolidate Cases; granting 9 Motion to Appoint Lead Plaintiff.. Signed by Chief Judge Garrett E. Brown, Jr. on 12/30/08. (lk) (Entered: 12/30/2008)
<u>15</u>	Jan. 06, 2009	13	AFFIDAVIT of Service for Summons and Complaint served on Synchronoss, Inc. on January 5, 2009, filed by BARRY SCHUTSKY. (NOTIS, JAMES) (Entered: 01/06/2009)
<u>16</u>	Jan. 06, 2009	14	AFFIDAVIT of Service for Summons and Complaint served on Stephen G. Waldis on January 5, 2009, filed by BARRY SCHUTSKY. (NOTIS, JAMES) (Entered: 01/06/2009)
<u>17</u>	Jan. 06, 2009	15	AFFIDAVIT of Service for Summons and Complaint served on Lawrence R. Irving on January 5, 2009, filed by BARRY SCHUTSKY. (NOTIS, JAMES) (Entered: 01/06/2009)
<u>18</u>	Jan. 06, 2009	16	NOTICE of Appearance by TODD LESLIE KAMMERMAN on behalf of BARRY SCHUTSKY (KAMMERMAN, TODD) (Entered: 01/06/2009)
<u>19</u>	Jan. 06, 2009	17	NOTICE of Appearance by ARIANA J. TADLER on behalf of BARRY SCHUTSKY (TADLER, ARIANA) (Entered: 01/06/2009)
<u>20</u>	Jan. 29, 2009	18	STATEMENT (JOINT) REGARDING SCHEDULE FOR AMENDED COMPLAINT AND MOTION TO DISMISS by Herman Braude, Richard Kerwick. (NOTIS, JAMES) (Entered: 01/29/2009)
<u>21</u>	Jan. 30, 2009	19	ORDER that lead pltf's. file amended consolidated complaint by 3/13/09; defts. file answers or motions by 4/24/09; and setting briefing schedule. Signed by Chief Judge Garrett E. Brown, Jr. on 1/29/09. (lk) (Entered: 01/30/2009)
<u>22</u>	Mar. 09, 2009	20	Letter from Brian J. McMahon to the Honorable Tonianne J. Bongiovanni, U.S.M.J.. (Attachments: # 1 Certification of Brian J. McMahon, # 2 Certification of Jordan D. Hershman, # 3 Certification of Jason D. Frank, # 4 Certification of James P. Lucking, # 5 Certification of William R. Harb, # 6 Proposed Consent Order, # 7 Certificate of Service)(MCMAHON, BRIAN) (Entered: 03/09/2009)
<u>23</u>	Mar. 12, 2009	21	CONSENT ORDER admitting Jordan D. Hershman, Esq., Jason D. Frank, Esq., James P. Lucking, Esq. & William R. Harb, Esq. leave to appear pro hac vice. Signed by Chief Judge Garrett E. Brown, Jr. on 3/11/09. (lk) (Entered: 03/13/2009)
<u>24</u>	Mar. 13, 2009	22	AMENDED COMPLAINT and Jury Trial Demand against all defendants all defendants., filed by Herman Braude, Richard Kerwick.(NOTIS, JAMES) (Entered: 03/13/2009)