



December 15, 2021

SENT ON BEHALF OF (1) AMERICAN CENTURY CAPITAL PORTFOLIOS, INC. AND (2) AMERICAN CENTURY INVESTMENT MANAGEMENT, INC. VIA ELECTRONIC TRANSMISSION

U.S. Securities and Exchange Commission
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-4720

Re: Vera A. Hays v. American Century Capital Portfolios, Inc, American Century Investment Management, Inc., et al.; Case No. 3:21-cv-08625

To whom it may concern:

This notice is sent jointly and separately on behalf of American Century Capital Portfolios, Inc. ("ACCP") and American Century Investment Management, Inc. ("ACIM"), each of whom are registered investment companies and each of whom are defendants in the above captioned lawsuit filed in the United States District Court for the Northern District of California.

Attached, please find a copy of all documents on the Court's docket publicly available as of the date of this transmittal that have been filed since the last update submitted.

Please contact the undersigned if you have any questions or concerns regarding this filing.

Sincerely,

A handwritten signature in black ink that reads "Janet A. Nash".

Janet A. Nash,
SVP Deputy General Counsel

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Attorneys for Defendants Chris H. Cheesman, Rajesh
K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C.
Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine
Strandjord, John R. Whitten, and Stephen E. Yates

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

NOTICE OF APPEARANCE

Judge: The Honorable Charles R. Breyer

Date Action Filed: November 5, 2021

TO THE CLERK OF THIS COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Michelle L. Landry of Vedder Price (CA), LLP, hereby enters an appearance as counsel for Defendants Chris H. Cheesman, Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates in the above-referenced action. Please serve said counsel with all pleadings and notices in this action.

Michelle L. Landry
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275 Battery Street, Suite 2464
San Francisco, CA 94111
Telephone: (415) 749-9500
Facsimile: (415) 749-9502

Dated: December 10, 2021

VEDDER PRICE (CA), LLP

By: /s/ Michelle L. Landry
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Attorneys for Defendants Chris H. Cheesman,
Rajesh K. Gupta, Thomas W. Bunn, Barry
Fink, Andrea C. Hall, Jan M. Lewis, Lynn
Jenkins, M. Jeannine Strandjord, John R.
Whitten, and Stephen E. Yates

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rlending@vedderprice.com

Attorneys for Defendants Chris H. Cheesman, Rajesh
K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C.
Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine
Strandjord, John R. Whitten, and Stephen E. Yates

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

**CERTIFICATION OF INTERESTED
ENTITIES OR PERSONS BY
DEFENDANTS CHRIS H. CHEESMAN,
RAJESH K. GUPTA, THOMAS W.
BUNN, BARRY FINK, ANDREA C.
HALL, JAN M. LEWIS, LYNN JENKINS,
M. JEANNINE STRANDJORD, JOHN R.
WHITTEN AND STEPHEN E. YATES**

Judge: The Honorable Charles R. Breyer

Date Action Filed: November 5, 2021

1 The undersigned is counsel of record for Defendants Chris H. Cheesman, Rajesh K. Gupta,
2 Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine
3 Strandjord, John R. Whitten, and Stephen E. Yates.

4 Pursuant to Civil L.R. 3-15, the undersigned certifies that as of this date, other than the
5 named parties, there is no such interest to report.

6
7 Dated: December 10, 2021

VEDDER PRICE (CA), LLP

8
9 By: /s/ Michelle L. Landry
Michelle L. Landry (SBN 190080)
275 Battery Street, Suite 2464
10 San Francisco, CA 94111
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12 Randall M. Lending (*pro hac vice* forthcoming)
13 222 North LaSalle Street
14 Chicago, Illinois 60601
15 Telephone: (312) 609-7564
rlending@vedderprice.com

16 Attorneys for Defendants Chris H. Cheesman,
17 Rajesh K. Gupta, Thomas W. Bunn, Barry
Fink, Andrea C. Hall, Jan M. Lewis, Lynn
18 Jenkins, M. Jeannine Strandjord, John R.
Whitten, and Stephen E. Yates

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Vera A. Hays
Plaintiff(s),
v.
American Century Capital Portfolios,
Inc., et al.
Defendant(s).

Case No. 3:21-cv-08625

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

I, Randall M. Lending, an active member in good standing of the bar of
State of Illinois, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: Thomas Bunn, *see below in the
above-entitled action. My local co-counsel in this case is Michelle Landry, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 190080.

222 N. LaSalle St., Chicago, IL 60601

275 Battery Street, Suite 2464, San Francisco, CA 94111

MY ADDRESS OF RECORD

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

312-609-7500

415-749-9500

MY TELEPHONE # OF RECORD

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

rlending@vedderprice.com

mlandry@vedderprice.com

MY EMAIL ADDRESS OF RECORD

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 06198407.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

*Chris Cheesman, Barry Fink, Rajesh Gupta, Andrea Hall, Lynn Jenkins, Jan Lewis, M. Jeannine
Standjord, John Whitten, Stephen Yates

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 10, 2021

Randall M. Lending

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Randall M. Lending is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE

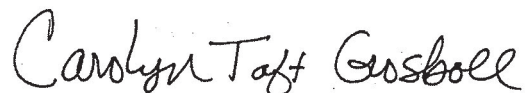
Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Randall Marc Lending

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/10/1988 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 4th day of
November, 2021.



Clerk,
Supreme Court of the State of Illinois

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Vera A. Hays
Plaintiff(s),
v.
American Century Capital Portfolios,
Inc., et al.
Defendant(s).

Case No. 3:21-cv-08625

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

I, Joshua D. Nichols, an active member in good standing of the bar of
State of Illinois, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: Thomas Bunn, *see below in the
above-entitled action. My local co-counsel in this case is Michelle Landry, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 190080.

222 N. LaSalle St., Chicago, IL 60601

275 Battery Street, Suite 2464, San Francisco, CA 94111

MY ADDRESS OF RECORD

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

312-609-7500

415-749-9500

MY TELEPHONE # OF RECORD

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

jnichols@vedderprice.com

mlandry@vedderprice.com

MY EMAIL ADDRESS OF RECORD

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 6302645.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

*Chris Cheesman, Barry Fink, Rajesh Gupta, Andrea Hall, Lynn Jenkins, Jan Lewis, M. Jeannine
Standjord, John Whitten, Stephen Yates

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 10, 2021

Joshua D. Nichols

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Joshua D. Nichols is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE

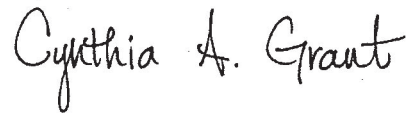
Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Joshua David Nichols

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/04/2010 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 2nd day of
December, 2021.



Clerk,
Supreme Court of the State of Illinois

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Attorneys for Defendants American Century Investment Management, Inc., American Century Investment Services, Inc., American Century Capital Portfolios, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean Wade

Michelle L. Landry (SBN 190080)
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Attorneys for Defendants Chris H. Cheesman, Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

**STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE,
TIME TO RESPOND TO
COMPLAINT, AND CONTINUANCE
OF CASE MANAGEMENT
DEADLINES**

Judge: The Honorable Charles R. Breyer

Date Action Filed: November 5, 2021

1 Plaintiff Vera A. Hays (“Plaintiff”) and Defendants American Century Capital Portfolios,
 2 Inc., American Century Investment Management, Inc., American Century Investment Services,
 3 Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, C. Jean Wade, Chris H. Cheesman,
 4 Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins,
 5 M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates (collectively, “Defendants”), by
 6 and through their undersigned counsel, subject to this Court’s approval, agree and stipulate as
 7 follows:

8 RECITALS

9 WHEREAS, on November 5, 2021, Plaintiff filed a putative class action complaint
 10 against the Defendants asserting claims under Sections 11, 12(a)(2) and 15 of the Securities Act
 11 (the “Complaint”);

12 WHEREAS, on November 8, 2021, this Court issued an Initial Case Management
 13 Scheduling Order setting the following dates: January 14, 2022 for the parties to comply with
 14 certain requirements under the Federal Rules of Civil Procedure, the Civil Local Rules, and
 15 Alternative Dispute Resolution (“ADR”) Local Rules regarding initial disclosures, early
 16 settlement, ADR process selection, and discovery planning; January 28, 2022 for the parties to
 17 file a Rule 26(f) Report, complete initial disclosures, or state objection in Rule 26(f) Report and
 18 file a Joint Case Management Conference Statement; and February 4, 2022 at 8:30 a.m. for an
 19 Initial Case Management Conference;

20 WHEREAS, the claims asserted in the Complaint in this action are governed by the
 21 Private Securities Litigation Reform Act (the “PSLRA”), 15 U.S.C. § 78u-4 *et seq.*, which
 22 provides a procedure for the appointment by the Court of lead plaintiff(s) and lead counsel to
 23 represent the putative class;

24 WHEREAS, it is anticipated that any motion(s) for the appointment of lead plaintiff(s)
 25 and lead counsel will be filed on January 10, 2022;

26 WHEREAS, on or about November 22, 2021, Defendants American Century Investment
 27 Management, Inc. and American Century Investment Services, Inc. were served with summons

1 and the Complaint in the above-captioned action;

2 WHEREAS, the other Defendants have each agreed to accept service of the Complaint
3 subject to the terms and conditions of the stipulation below; and

4 WHEREAS, Defendants do not waive, and specifically preserve, their rights to assert any
5 and all defenses in this matter, including but not limited to improper venue, except as to the
6 sufficiency of service of process of the Summons and Complaint.

7 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between
8 the attorneys for Plaintiff and the attorneys for the Defendants, as follows:

9 1. The undersigned counsel for the Defendants are authorized to accept, and hereby
10 do accept, service of the Summons and the Complaint in the above-captioned action on behalf of
11 each of the Defendants, without prejudice and without waiver of any defenses, objections, or
12 arguments in this matter or any other matter, including without limitation any arguments
13 regarding personal jurisdiction or venue, except as to sufficiency of service of process of the
14 Summons and Complaint.

15 2. No Defendant shall be required to answer or otherwise respond to the Complaint,
16 and each hereby is expressly relieved from answering or otherwise responding to the Complaint.

17 3. Upon entry of an order appointing lead plaintiff(s) and lead counsel in the above
18 captioned action (or a consolidated action encompassing the above-captioned action) pursuant to
19 the PSLRA, the lead plaintiff(s) and the Defendants shall confer regarding a schedule for the
20 filing of an amended complaint and any response thereto, and will promptly submit a joint
21 proposal or competing proposals for the Court's consideration.

22 4. The Initial Case Management Conference scheduled for February 4, 2022 shall be
23 continued until a date that is convenient for the Court, or _____, along with all associated
24 deadlines under the Federal Rules of Civil Procedures, the Local Civil Rules for the United States
25 District Court for the Northern District of California, and all associated ADR deadlines;

26 5. This Stipulation may be executed in separate counterparts, and counterparts may
27 be executed by e-mail or facsimile, each of which shall be an original.

1
2 Dated: December 10, 2021
3

**SCHUBERT JONCKHEER & KOLBE
LLP**

4 By: /s/ Willem F. Jonckheer
5 Willem F. Jonckheer
6 3 Embarcadero Center
7 Suite 1650
8 San Francisco, California
9 Telephone: (415) 788-4220

INVESTIGATION COUNSEL P.C.

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12 Toronto, ON M5H 2S6 Canada
13 Telephone: (416) 637-3152
14 jarchibald@investigationcounsel.com

Attorneys for Plaintiff Vera A. Hays

15 Dated: December 10, 2021

MILBANK LLP

16 By: /s/ Mark D. Villaverde
17 Mark D. Villaverde (SBN 331876)
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19 Los Angeles, California
20 Telephone: (424) 386-4000
21 mvillaverde@milbank.com

22 Sean Murphy (*pro hac vice* forthcoming)
23 Robert Hora (*pro hac vice* forthcoming)
24 Katrin Cassidy-Ginsberg (*pro hac vice*
25 forthcoming)
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*Attorneys for Defendants American
Century Capital Portfolios, Inc., American
Century Investment Management, Inc.,
American Century Investment Services,*

1
2 Dated: December 10, 2021

*Inc., Jonathan Thomas, Patrick Bannigan,
R. Wes Campbell, and C. Jean Wade*
VEDDER PRICE P.C.

3
4 By: /s/ Michelle L. Landry
Michelle L. Landry (SBN 190080)
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7 Randall M. Lending (*pro hac vice*
forthcoming)
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11 *Attorneys for Defendants Chris H.*
Cheesman, Rajesh K. Gupta, Thomas W.
Bunn, Barry Fink, Andrea C. Hall, Jan M.
Lewis, Lynn Jenkins, M. Jeannine
Strandjord, John R. Whitten, and Stephen
E. Yates

14 Pursuant to Civil Local Rule 5-1(h)(3), all signatories concur in filing this stipulation.

15
16 Dated: December 10, 2021

By: /s/ Mark D. Villaverde
Mark D. Villaverde (SBN 331876)

18 * * *

19 **[PROPOSED] ORDER**

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

21 Dated: _____, 2021
22 San Francisco, California

23 _____
24 HON. CHARLES R. BREYER
25 UNITED STATES DISTRICT JUDGE
26
27

Mark D. Villaverde (SBN 331876)
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55 Hudson Yards
New York, New York 10001
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rhora@milbank.com
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Attorneys for Defendants American Century Investment Management, Inc., American Century Investment Services, Inc., American Century Capital Portfolios, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean Wade

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Chicago, Illinois 60601
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Attorneys for Defendants Chris H. Cheesman, Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

**DECLARATION OF MARK D.
VILLAVERDE IN SUPPORT OF
STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE,
TIME TO RESPOND TO
COMPLAINT, AND
CONTINUANCE OF CASE
MANAGEMENT DEADLINES**

Judge: The Honorable Charles R. Breyer
Date Action Filed: November 5, 2021

Case No. 3:21-cv-08625-CRB

DECLARATION OF MARK D. VILLAVERDE IN
SUPPORT OF STIPULATION AND [PROPOSED]
ORDER REGARDING SERVICE, TIME TO
RESPOND TO COMPLAINT, AND CONTINUANCE
OF CASE MANAGEMENT DEADLINES

1 I, MARK D. VILLAVERDE, declare:

2 1. I am an active member in good standing of the State Bar of California and an
3 attorney for Defendants American Century Investment Management, Inc., American Century
4 Investment Services, Inc., American Century Capital Portfolios, Inc., Jonathan Thomas, Patrick
5 Bannigan, R. Wes Campbell, and C. Jean Wade. I have personal knowledge of the facts stated in
6 this declaration and if necessary could and would testify competently under oath thereto.

7 2. On November 5, 2021, Plaintiff filed a putative class action complaint against the
8 Defendants in the above-referenced action asserting claims under Sections 11, 12(a)(2) and 15 of
9 the Securities Act (the “Complaint”).

10 3. On November 8, 2021, this Court issued an Order Setting Initial Case
11 Management Conference And ADR Deadlines setting the following deadlines: January 14, 2022
12 for the parties to comply with certain requirements under the Federal Rules of Civil Procedure,
13 the Civil Local Rules, and Alternative Dispute Resolution (“ADR”) Local Rules regarding initial
14 disclosures, early settlement, ADR process selection, and discovery planning; January 28, 2022
15 for the parties to file a Rule 26(f) Report, complete initial disclosures, or state objection in Rule
16 26(f) Report and file a Joint Case Management Conference Statement; and February 4, 2022 at
17 8:30 a.m. for an Initial Case Management Conference.

18 4. On or about November 22, 2021, Defendants American Century Investment
19 Management, Inc. and American Century Investment Services, Inc. were served with summons
20 and the Complaint in the above-captioned action. The other Defendants have each agreed to
21 accept service of the Complaint subject to the terms and conditions of the accompanying
22 stipulation.

23 5. The claims asserted in the Complaint in this action are governed by the Private
24 Securities Litigation Reform Act (the “PSLRA”), 15 U.S.C. § 78u-4 et seq., which provides a
25 procedure for the appointment by the Court of lead plaintiff(s) and lead counsel to represent the
26 putative class. It is anticipated that any motion(s) for the appointment of lead plaintiff(s) and
27 lead counsel will be filed on January 10, 2022. Thereafter, the parties expect the Court to set a

1 schedule for the filing of an amended or consolidated complaint by Lead Plaintiff.

2 6. The special procedures specified in the PSLRA contemplate (i) the consolidation
3 of similar actions (if any such similar actions are filed), (ii) appointment of Lead Plaintiff, and
4 (iii) the filing of a complaint by the Lead Plaintiff. Therefore, requiring Defendants to respond at
5 this time to the existing complaint in the above-referenced action would be contrary to the
6 PSLRA and would result in the needless expenditure of private and judicial resources.

7 7. Because the pleadings are not yet set, good cause exists to vacate the existing
8 February 4, 2022 initial case management conference, along with all associated deadlines under
9 the Federal Rules of Civil Procedures, the Local Civil Rules for the United States District Court
10 for the Northern District of California, and all associated ADR deadlines until such time as the
11 Court has the opportunity to rule on the appointment of Lead Plaintiff and its counsel.

12 8. By the joint stipulation filed contemporaneously herewith, and subject to the
13 approval of the Court, the parties also request that no Defendant shall be required to answer or
14 otherwise respond to the Complaint, and pursuant to the stipulation each is expressly relieved
15 from answering or otherwise responding to the Complaint. Upon entry of an order appointing
16 lead plaintiff(s) and lead counsel in the above captioned action (or a consolidated action
17 encompassing the above-captioned action) pursuant to the PSLRA, the lead plaintiff(s) and the
18 Defendants shall confer regarding a schedule for the filing of an amended complaint and any
19 response thereto, and will promptly submit a joint proposal or competing proposals for the
20 Court's consideration.

21 9. Defendants do not waive any defenses, objections, or arguments in this matter or
22 any other matter, including without limitation any arguments regarding personal jurisdiction or
23 venue, except as to sufficiency of service of process of the Summons and Complaint.

24 10. No previous modifications to any deadlines in this action have been made at any
25 party's request.

26 11. The requested modifications should not have a material impact on the prosecution
27 of the lawsuit.

1
2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct, and that this Declaration was executed on this 10th day of
4 December, 2021.

5
6 By: /s/ Mark D. Villaverde
7 Mark D. Villaverde (SBN 331876)
8
9
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11
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Mark D. Villaverde (SBN 331876)
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MVillaverde@milbank.com

Sean Murphy (*pro hac vice* forthcoming)
Robert Hora (*pro hac vice* forthcoming)
Katrin Cassidy-Ginsberg (*pro hac vice* forthcoming)
55 Hudson Yards
New York, NY 10001
Tel.: 212-530-5000
SMurphy@milbank.com
RHora@milbank.com
KCassidy-Ginsberg@milbank.com

*Counsel for Defendants American Century Investment Management, Inc.,
American Century Investment Services, Inc., American Century Capital
Portfolios, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and
C. Jean Wade*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

**CORPORATE DISCLOSURE
STATEMENT PURSUANT TO
FRCP 7.1 AND CERTIFICATION
OF INTERESTED ENTITIES OR
PERSONS PURSUANT TO L.R. 3-17**

Judge: The Honorable Charles R. Breyer

Date Action Filed: November 5, 2021

1 Defendants American Century Investment Management, Inc. (“ACIM”), American
2 Century Investment Services, Inc. (“ACIS”), American Century Capital Portfolios, Inc.
3 (“ACCP”), Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean Wade submit the
4 following corporate disclosure statement pursuant to Rule 7.1 of the Federal Rules of Civil
5 Procedure and certification of interested entities or persons pursuant to Civil L.R. 3-15. Pursuant
6 to Civil L.R. 3-15, the undersigned certifies that the following listed persons, associations of
7 persons, firms, partnerships, corporations (including parent corporations), or other entities
8 (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or
9 (ii) have a non-financial interest in that subject matter or in a party that could be substantially
10 affected by the outcome of this proceeding:

11 1. Defendants ACIM and ACIS are each subsidiaries of American Century
12 Companies, Inc. (“ACC”), a privately held corporation.

13 2. The Stowers Institute for Medical Research (“SIMR”), Stowers Resource
14 Management, Inc. (“SRM”), and Stowers Policy Institute Inc. (“SPI”) (collectively “Stowers”),
15 all of which are nonprofit organizations, collectively own more than 40% equity and voting
16 interests, respectively, in ACC.

17 3. Nomura AM Holdings USA, LLC. owns a minority interest in ACC. Nomura
18 AM Holdings USA, LLC is an indirect subsidiary of Nomura Holdings, Inc., a publicly-traded
19 corporation (any Nomura Group Company holding shares of ACC is referred to hereinafter as a
20 “Nomura Holder”).

21 4. Certain other outstanding shares of ACC not owned by Stowers and Nomura
22 Holders are owned, either directly or through employee benefit plans, by current or former
23 officers and employees of ACC and its subsidiaries.

24 5. Defendant ACCP is registered under the Investment Company Act of 1940, as
25 amended, as an open-end management investment company and is incorporated in Maryland.
26 ACCP has no parent company.

6. Defendants do not waive any defenses, objections, or arguments in this matter or any other matter, including without limitation any arguments regarding personal jurisdiction or venue, except as to sufficiency of service of process of the Summons and Complaint.

Dated: December 10, 2021
Los Angeles, California

MILBANK LLP

By: /s/ Mark D. Villaverde
Mark D. Villaverde, Esq.
2029 Century Park E
Los Angeles, California
Telephone: (213) 629-5063
mvillaverde@milbank.com

Sean Murphy, Esq. (*pro hac vice* forthcoming)
Robert Hora, Esq. (*pro hac vice* forthcoming)
Katrín Cassidy-Ginsberg, Esq. (*pro hac vice* forthcoming)
55 Hudson Yards
New York, NY 10001
Tel.: 212-530-5000
smurphy@milbank.com
rhora@milbank.com
kcassidy-ginsberg@milbank.com

Counsel for Defendants American Century Investment Management, Inc., American Century Investment Services, Inc., American Century Capital Portfolios, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean Wade

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Vera A. Hays
Plaintiff(s),
v.
American Century Capital Portfolios,
Inc., et al.
Defendant(s).

Case No. 3:21-cv-08625

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE : ORDER
(CIVIL LOCAL RULE 11-3)**

I, Randall M. Lending, an active member in good standing of the bar of
State of Illinois, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: Thomas Bunn, *see below in the
above-entitled action. My local co-counsel in this case is Michelle Landry, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 190080.

222 N. LaSalle St., Chicago, IL 60601

275 Battery Street, Suite 2464, San Francisco, CA 94111

MY ADDRESS OF RECORD

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

312-609-7500

415-749-9500

MY TELEPHONE # OF RECORD

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

rlending@vedderprice.com

mlandry@vedderprice.com

MY EMAIL ADDRESS OF RECORD

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 06198407.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

*Chris Cheesman, Barry Fink, Rajesh Gupta, Andrea Hall, Lynn Jenkins, Jan Lewis, M. Jeannine
Standjord, John Whitten, Stephen Yates

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 10, 2021

Randall M. Lending

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Randall M. Lending is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: December 13, 2021



UNITED STATES DISTRICT/MAGISTRATE JUDGE

United States District Court
Northern District of California

Certificate of Admission To the Bar of Illinois

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Randall Marc Lending

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/10/1988 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 4th day of
November, 2021.

Carolyn Taft Grosboll

Clerk,
Supreme Court of the State of Illinois

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Vera A. Hays
Plaintiff(s),
v.
American Century Capital Portfolios,
Inc., et al.
Defendant(s).

Case No. 3:21-cv-08625

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE : ORDER
(CIVIL LOCAL RULE 11-3)**

I, Joshua D. Nichols, an active member in good standing of the bar of
State of Illinois, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: Thomas Bunn, *see below in the
above-entitled action. My local co-counsel in this case is Michelle Landry, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 190080.

222 N. LaSalle St., Chicago, IL 60601

275 Battery Street, Suite 2464, San Francisco, CA 94111

MY ADDRESS OF RECORD

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

312-609-7500

415-749-9500

MY TELEPHONE # OF RECORD

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

jnichols@vedderprice.com

mlandry@vedderprice.com

MY EMAIL ADDRESS OF RECORD

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 6302645.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

*Chris Cheesman, Barry Fink, Rajesh Gupta, Andrea Hall, Lynn Jenkins, Jan Lewis, M. Jeannine
Standjord, John Whitten, Stephen Yates

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 10, 2021

Joshua D. Nichols

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Joshua D. Nichols is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: December 13, 2021



UNITED STATES DISTRICT/MAGISTRATE JUDGE

United States District Court
Northern District of California

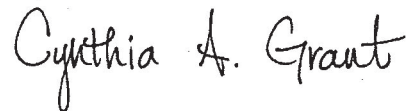
Certificate of Admission To the Bar of Illinois

I, Cynthia A. Grant, Clerk of the Supreme Court of Illinois, do hereby certify that

Joshua David Nichols

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/04/2010 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto
subscribed my name and affixed the
seal of said Court, this 2nd day of
December, 2021.



Clerk,
Supreme Court of the State of Illinois

Mark D. Villaverde (SBN 331876)
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MVillaverde@milbank.com

Sean Murphy (*pro hac vice* forthcoming)
Robert Hora (*pro hac vice* forthcoming)
Katrin Cassidy-Ginsberg (*pro hac vice* forthcoming)
55 Hudson Yards

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smurphy@milbank.com
rhora@milbank.com
kcassidy-ginsberg@milbank.com

Attorneys for Defendants American Century Investment Management, Inc., American Century Investment Services, Inc., American Century Capital Portfolios, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean Wade

Michelle L. Landry (SBN 190080)
VEDDER PRICE (CA), LLP
275 Battery Street, Suite 2464
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Randall M. Lending (*pro hac vice* forthcoming)
222 North LaSalle Street
Chicago, Illinois 60601
Telephone: (312) 609-7564
rlending@vedderprice.com

Attorneys for Defendants Chris H. Cheesman, Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated,

Plaintiff,

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.,

Defendants.

Case No. 3:21-cv-08625-CRB

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING SERVICE,
TIME TO RESPOND TO
COMPLAINT, AND CONTINUANCE
OF CASE MANAGEMENT
DEADLINES**

Judge: The Honorable Charles R. Breyer

Date Action Filed: November 5, 2021

Plaintiff Vera A. Hays (“Plaintiff”) and Defendants American Century Capital Portfolios, Inc., American Century Investment Management, Inc., American Century Investment Services, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, C. Jean Wade, Chris H. Cheesman, Rajesh K. Gupta, Thomas W. Bunn, Barry Fink, Andrea C. Hall, Jan M. Lewis, Lynn Jenkins, M. Jeannine Strandjord, John R. Whitten, and Stephen E. Yates (collectively, “Defendants”), by and through their undersigned counsel, subject to this Court’s approval, agree and stipulate as follows:

RECITALS

WHEREAS, on November 5, 2021, Plaintiff filed a putative class action complaint against the Defendants asserting claims under Sections 11, 12(a)(2) and 15 of the Securities Act (the “Complaint”);

WHEREAS, on November 8, 2021, this Court issued an Initial Case Management Scheduling Order setting the following dates: January 14, 2022 for the parties to comply with certain requirements under the Federal Rules of Civil Procedure, the Civil Local Rules, and Alternative Dispute Resolution (“ADR”) Local Rules regarding initial disclosures, early settlement, ADR process selection, and discovery planning; January 28, 2022 for the parties to file a Rule 26(f) Report, complete initial disclosures, or state objection in Rule 26(f) Report and file a Joint Case Management Conference Statement; and February 4, 2022 at 8:30 a.m. for an Initial Case Management Conference;

WHEREAS, the claims asserted in the Complaint in this action are governed by the Private Securities Litigation Reform Act (the “PSLRA”), 15 U.S.C. § 78u-4 *et seq.*, which provides a procedure for the appointment by the Court of lead plaintiff(s) and lead counsel to represent the putative class;

WHEREAS, it is anticipated that any motion(s) for the appointment of lead plaintiff(s) and lead counsel will be filed on January 10, 2022;

WHEREAS, on or about November 22, 2021, Defendants American Century Investment Management, Inc. and American Century Investment Services, Inc. were served with summons

and the Complaint in the above-captioned action;

WHEREAS, the other Defendants have each agreed to accept service of the Complaint subject to the terms and conditions of the stipulation below; and

WHEREAS, Defendants do not waive, and specifically preserve, their rights to assert any and all defenses in this matter, including but not limited to improper venue, except as to the sufficiency of service of process of the Summons and Complaint.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for Plaintiff and the attorneys for the Defendants, as follows:

1. The undersigned counsel for the Defendants are authorized to accept, and hereby do accept, service of the Summons and the Complaint in the above-captioned action on behalf of each of the Defendants, without prejudice and without waiver of any defenses, objections, or arguments in this matter or any other matter, including without limitation any arguments regarding personal jurisdiction or venue, except as to sufficiency of service of process of the Summons and Complaint.

2. No Defendant shall be required to answer or otherwise respond to the Complaint, and each hereby is expressly relieved from answering or otherwise responding to the Complaint.

3. Upon entry of an order appointing lead plaintiff(s) and lead counsel in the above captioned action (or a consolidated action encompassing the above-captioned action) pursuant to the PSLRA, the lead plaintiff(s) and the Defendants shall confer regarding a schedule for the filing of an amended complaint and any response thereto, and will promptly submit a joint proposal or competing proposals for the Court's consideration.

4. The Initial Case Management Conference scheduled for February 4, 2022 shall be continued until a date that is convenient for the Court, or May 6, 2022 at 8:30 a.m., along with all associated deadlines under the Federal Rules of Civil Procedures, the Local Civil Rules for the United States District Court for the Northern District of California, and all associated ADR deadlines;

5. This Stipulation may be executed in separate counterparts, and counterparts may be executed by e-mail or facsimile, each of which shall be an original.

1
2 Dated: December 10, 2021

**SCHUBERT JONCKHEER & KOLBE
LLP**

3
4 By: /s/ Willem F. Jonckheer
5 Willem F. Jonckheer
6 3 Embarcadero Center
7 Suite 1650
8 San Francisco, California
9 Telephone: (415) 788-4220

INVESTIGATION COUNSEL P.C.

10 John Archibald (admitted *pro hac vice*)
11 350 Bay Street, Suite 1100
12 Toronto, ON M5H 2S6 Canada
13 Telephone: (416) 637-3152
14 jarchibald@investigationcounsel.com

Attorneys for Plaintiff Vera A. Hays

15 Dated: December 10, 2021

MILBANK LLP

16 By: /s/ Mark D. Villaverde
17 Mark D. Villaverde (SBN 331876)
18 2029 Century Park E
19 Los Angeles, California
20 Telephone: (424) 386-4000
21 mvillaverde@milbank.com

22 Sean Murphy (*pro hac vice* forthcoming)
23 Robert Hora (*pro hac vice* forthcoming)
24 Katrin Cassidy-Ginsberg (*pro hac vice*
25 forthcoming)
26 55 Hudson Yards
27 New York, New York 10001
28 Telephone: (212) 530-5000
smurphy@milbank.com
rhora@milbank.com
kcassidy-ginsberg@milbank.com

*Attorneys for Defendants American
Century Capital Portfolios, Inc., American
Century Investment Management, Inc.,
American Century Investment Services,*

Dated: December 10, 2021

*Inc., Jonathan Thomas, Patrick Bannigan,
R. Wes Campbell, and C. Jean Wade*
VEDDER PRICE P.C.

By: /s/ Michelle L. Landry
Michelle L. Landry (SBN 190080)
275 Battery Street, Suite 2464
San Francisco, CA 94111
Telephone: (415) 749-9500
mlandry@vedderprice.com

Randall M. Lending (*pro hac vice*
forthcoming)
222 North LaSalle Street
Chicago, Illinois 60601
Telephone: (312) 609-7564
rlending@vedderprice.com

*Attorneys for Defendants Chris H.
Cheesman, Rajesh K. Gupta, Thomas W.
Bunn, Barry Fink, Andrea C. Hall, Jan M.
Lewis, Lynn Jenkins, M. Jeannine
Strandjord, John R. Whitten, and Stephen
E. Yates*

Pursuant to Civil Local Rule 5-1(h)(3), all signatories concur in filing this stipulation.

Dated: December 10, 2021


By: /s/ Mark D. Villaverde
Mark D. Villaverde (SBN 331876)

* * *

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: December 13, 2021
San Francisco, California


HON. CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated

Plaintiff(s),

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al.

Defendant(s).

Case No. 3:21-cv-08625-CRB

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

I, Robert C. Hora, an active member in good standing of the bar of
New York, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: American Century Capital Portfolios, Inc., * (see below) in the
above-entitled action. My local co-counsel in this case is Mark D. Villaverde, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 331876.

55 Hudson Yards, New York, New York 10001

MY ADDRESS OF RECORD

212.530.5000

MY TELEPHONE # OF RECORD

rhora@milbank.com

MY EMAIL ADDRESS OF RECORD

2029 Century Park E 33rd Flr., Los Angeles CA

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

213.629.5063

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

mvillaverde@milbank.com

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 4142873.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

* American Century Investment Management, Inc., American Century Investment
Services, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean
Wade

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/13/2021

Robert C. Hora

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Robert C. Hora is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE



*Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department*

I, Maria T. Fasulo, Acting Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that

Robert Charles Hora

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on July 23, 2003, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.



In Witness Whereof, I have hereunto set my hand in the City of Brooklyn on November 30, 2021.

Maria T. Fasulo

Acting Clerk of the Court



Appellate Division
Supreme Court of the State of New York
Second Judicial Department
45 Monroe Place
Brooklyn, N.Y. 11201
(718) 875-1300

HECTOR D. LASALLE
PRESIDING JUSTICE

MARIA T. FASULO
ACTING CLERK OF THE COURT

DARRELL M. JOSEPH
DEPUTY CLERKS

KENNETH BAND
MELISSA KRAKOWSKI
WENDY STYNES
ASSOCIATE DEPUTY CLERKS

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the Second Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

A handwritten signature in black ink that reads "Maria T. Fasulo". The signature is written in a cursive, flowing style.

Maria T. Fasulo
Acting Clerk of the Court

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated ,

Plaintiff(s),

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al. ,

Defendant(s).

Case No. 3:21-cv-08625-CRB

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

I, Katrin Cassidy-Ginsberg, an active member in good standing of the bar of
New York, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: American Century Capital Portfolios, Inc., * (see below) in the
above-entitled action. My local co-counsel in this case is Mark D. Villaverde, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 331876.

55 Hudson Yards, New York, New York 10001

MY ADDRESS OF RECORD

212.530.5000

MY TELEPHONE # OF RECORD

kcassidy-ginsberg@milbank.com

MY EMAIL ADDRESS OF RECORD

2029 Century Park E 33rd Flr., Los Angeles CA

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

213.629.5063

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

mvillaverde@milbank.com

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 5698758.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

* American Century Investment Management, Inc., American Century Investment
Services, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean
Wade

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/13/2021

Katrin Cassidy-Ginsberg

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Katrin Cassidy-Ginsberg is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Katrín Alissandra Cassidy-Ginsberg

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on April 8, 2019, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

*In Witness Whereof, I have hereunto set
my hand in the City of New York on
November 29, 2021.*



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

ROLANDO T. ACOSTA
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

VERA A. HAYS, individually and on behalf of
herself and all others similarly situated ,

Plaintiff(s),

v.

AMERICAN CENTURY CAPITAL
PORTFOLIOS, INC., et al. ,

Defendant(s).

Case No. 3:21-cv-08625-CRB

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

I, Sean M. Murphy, an active member in good standing of the bar of
New York, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: American Century Capital Portfolios, Inc., * (see below) in the
above-entitled action. My local co-counsel in this case is Mark D. Villaverde, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 331876.

55 Hudson Yards, New York, New York 10001

MY ADDRESS OF RECORD

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MY TELEPHONE # OF RECORD

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MY EMAIL ADDRESS OF RECORD

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LOCAL CO-COUNSEL'S ADDRESS OF RECORD

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LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

mvillaverde@milbank.com

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: 2661395.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

* American Century Investment Management, Inc., American Century Investment
Services, Inc., Jonathan Thomas, Patrick Bannigan, R. Wes Campbell, and C. Jean
Wade

I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: 12/13/2021

Sean M. Murphy

APPLICANT

ORDER GRANTING APPLICATION

FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Sean M. Murphy is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Sean M. Murphy

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **January 23, 1995**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set
my hand in the City of New York on
November 29, 2021.*



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

ROLANDO T. ACOSTA
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020