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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANTON BIELOUSOV, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

GOPRO, INC. and NICHOLAS D.
WOODMAN,

Defendants

Case No.

**CLASS ACTION COMPLAINT FOR
VIOLATION OF THE FEDERAL
SECURITIES LAWS**

JURY TRIAL DEMANDED

Plaintiff Anton Bielousov (“Plaintiff”), individually and on behalf of all other persons similarly situated, by his undersigned attorneys, for his complaint against the Defendants named herein, alleges the following based upon personal knowledge as to Plaintiff and Plaintiff’s own acts, and information and belief as to all other matters, based upon, *inter alia*, the investigation conducted by and through Plaintiff’s attorneys, which included, among other things, a review of the Defendants’ public documents, conference calls and announcements made by Defendants, United States Securities and Exchange Commission (“SEC”) filings, wire and press releases published by and regarding GoPro, Inc. (“GoPro” or the “Company”), analysts’ reports and advisories about the Company, and information readily obtainable on the Internet. Plaintiff believes that substantial evidentiary support will exist for the allegations set forth herein after a reasonable opportunity for discovery.

NATURE OF THE ACTION

1
2 1. This is a federal securities class action on behalf of a class consisting of all persons other
3 than Defendants who purchased or otherwise acquired common shares of GoPro between September
4 19, 2016 and November 4, 2016, both dates inclusive (the “Class Period”). Plaintiff seeks to recover
5 compensable damages caused by Defendants’ violations of the federal securities laws and to pursue
6 remedies under Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”)
7 and Rule 10b-5 promulgated thereunder.
8

9 2. GoPro develops and sells mountable and wearable cameras and accessories in the United
10 States and internationally. The Company’s cameras are designed primarily for filming while immersed
11 in action, such as outdoor or extreme sports. On October 23, 2016, following months of delays, GoPro
12 released the Karma drone, a compact, foldable drone designed for aerial photography using GoPro’s
13 cameras.
14

15 3. Founded in 2004, the Company was formerly known as Woodman Labs, Inc. and
16 changed its name to GoPro, Inc. in February 2014. GoPro is headquartered in San Mateo, California,
17 and the Company’s common shares are traded on the NASDAQ Global Select Market (“NASDAQ”)
18 under the ticker symbol “GPRO.”
19

20 4. Throughout the Class Period, Defendants made materially false and misleading
21 statements regarding the Company’s business, operational and compliance policies. Specifically,
22 Defendants made false and/or misleading statements and/or failed to disclose that: (i) GoPro’s Karma
23 drones were prone to losing power midflight, causing them to fall out of the sky; (ii) the Company had
24 thus significantly overstated the utility of and likely customer demand for the Karma drone; (iii) the
25 foregoing issue, when publicly known, would necessitate a costly recall of the Company’s Karma
26 drones; and (iv) as a result, GoPro’s public statements were materially false and misleading at all
27 relevant times.
28

1 12. Venue is proper in this Judicial District pursuant to §27 of the Exchange Act (15 U.S.C.
2 §78aa) and 28 U.S.C. §1391(b) as GoPro’s principal executive offices are located within this Judicial
3 District.

4 13. In connection with the acts, conduct and other wrongs alleged in this Complaint,
5 Defendants, directly or indirectly, used the means and instrumentalities of interstate commerce,
6 including but not limited to, the United States mail, interstate telephone communications and the
7 facilities of the national securities exchange.
8

9 **PARTIES**

10 14. Plaintiff, as set forth in the accompanying Certification, purchased common shares of
11 GoPro at artificially inflated prices during the Class Period and was damaged upon the revelation of the
12 alleged corrective disclosure.
13

14 15. Defendant GoPro, Inc. is incorporated in Delaware, and the Company’s principal
15 executive offices are located at Pier 1, Bay 3, San Francisco, California 94111. GoPro’s common stock
16 trades on the NASDAQ under the ticker symbol “GPRO.”
17

18 16. Defendant Nicholas D. Woodman (“Woodman”) has served at all relevant times as the
19 Company’s Chief Executive Officer and Chairman.
20

21 **SUBSTANTIVE ALLEGATIONS**

22 **Background**

23 17. GoPro develops and sells mountable and wearable cameras, and accessories in the
24 United States and internationally. The Company’s cameras are designed primarily for filming while
25 immersed in action, such as outdoor or extreme sports.
26
27
28

Materially False and Misleading Statements Issued During the Class Period

1
2 18. The Class Period begins on September 19, 2016, when GoPro announced the imminent
3 release of the Company's Karma drone at a product launch event, following months of delays. The
4 Company's CEO, Defendant Woodman, stated, in part:

5 We're stoked to launch Karma and show how much more it is than a drone. Karma packs
6 Hollywood-caliber aerial, handheld and gear-mounted image stabilization into a
7 backpack for \$799. It's so easy to use, a beginner can have fun straight away. . . .

8 19. In a conference call following the launch event, Defendant Woodman addressed the
9 months-long delay preceding the Karma drone's launch, stating, in relevant part: "We felt the consumer
10 deserved that we take a little bit of extra time to nail it."

11 20. In an interview with Emily Chang on *Bloomberg Markets* following the launch event,
12 Defendant Woodman continued to promoted the Karma drone:

13 Emily Chang: So, talk to me about some of the use cases that you foresee.
14

15 Nick Woodman: Well, obviously consumers are going to have a blast using Karma to
16 capture their lives in a whole new way. . . . We think we're entering a new era of high-
17 quality, consumer generated content, it's going to be very exciting. . . . We expect Karma
18 to dramatically improve the quality of footage that film and television producers are able
19 to capture with GoPros [GoPro cameras], and as I said before, I think that Karma is so
20 capable and so versatile, whether you're capturing aerial footage, handheld footage, or
21 you're mounting Karma to a vehicle, or a bike, or a piece of equipment. I mean, I think
22 we're going to see people using Karma to study shock absorbers in the automotive
23 industry so that they can watch what a shock absorber is doing while a car is driving
24 down the road and improve the performance of those products. I think across the board,
25 Karma is going to be used for a ton of interesting applications.

26 Chang: What are your expectations for sales here? Hundreds of thousands of units?
27 Millions?

28 Woodman: Time will tell. But I do think that Karma hits a sweet spot, Karma hits a
sweet spot with existing GoPro customers. You know, we have millions and millions,
over 20 million GoPros sold since the introduction of our first HD Hero back in 2009 . . .
. We think we've got a terrific installed user base that's going to get a lot of functionality
and use out of Karma, but we also think that [it] can expand our markets and professional
capture, both in film and television production and in industry as well.

1 21. On news of the Karma drone's upcoming launch, GoPro's share price increased \$0.35,
2 or 2.34%, to close at \$15.31 on September 19, 2016, on unusually high trading volume.

3 22. On October 23, 2016, GoPro's Karma drone went on sale in the United States.

4 23. The statements referenced in ¶¶ 18 – 20 above were materially false and/or misleading
5 because they misrepresented and/or failed to disclose the following adverse facts pertaining to the
6 Company's business, operational and financial results, which were known to Defendants or recklessly
7 disregarded by them. Specifically, Defendants made false and/or misleading statements and/or failed to
8 disclose that: (i) GoPro's Karma drones were prone to losing power midflight, causing them to fall out
9 of the sky; (ii) the Company had thus significantly overstated the utility of and likely customer demand
10 for the Karma drone; (iii) the foregoing issue, when publicly known, would necessitate a costly recall of
11 the Company's Karma drones; and (iv) as a result, GoPro's public statements were materially false and
12 misleading at all relevant times.
13
14

15 **The Truth Emerges**

16 24. On November 3, 2016, shortly before the market closed, GoPro issued a press release
17 and filed a Current Report on Form 8-K with the SEC announcing the Company's financial and
18 operating results for the quarter ended September 30, 2016. Among other information, the Q3 2016
19 8-K provided revenue guidance for 2016 in the range of \$1.25 billion to \$1.3 billion—a significant
20 decrease from the revenue guidance of \$1.35 billion to \$1.5 billion that the Company had provided in
21 reporting its financial and operating results for the previous quarter, and consistent with an anticipated
22 recall of the Company's Karma drones.
23

24 25. On this news, GoPro's share price fell \$0.90, or 7.01%, to close at \$11.94 on November
25 3, 2016.
26

27 26. Nevertheless, in a post-market earnings call on November 3, 2016, Defendant Woodman
28 continued to tout the Karma drone:

1 With our recent product launches, we have delivered on the hardware and software vision
2 outlined at the time of our IPO. Hardware highlights include our new HERO5 line of
3 cameras, the most connected GoPros ever, and Karma, our exciting entry into the drone
4 market.

5 ...

6 Next, I'll review Karma, which went on sale in the U.S. on October 23. As we've shared,
7 Karma is so much more than a drone. It's Hollywood-caliber aerial, handheld and
8 mountable stabilization in a backpack for \$799. Karma represents an exciting set of
9 solutions for new and existing customers and extends our brand into an important new
10 category.

11 27. On November 4, 2016, GoPro's share price fell an additional \$0.78, or 6.53%, to close at
12 \$11.16.

13 28. On November 8, 2016, post-market, GoPro announced the recall of the approximately
14 2,500 Karma drones purchased by consumers since the product's release, advising that the Company
15 had discovered that Karma units were prone to losing power during operation.

16 29. On this news, GoPro's share price fell \$0.45, or 4.14%, to close at \$10.41 on November
17 9, 2016.

18 30. As a result of Defendants' wrongful acts and omissions, and the precipitous decline in
19 the market value of the Company's common shares, Plaintiff and other Class members have suffered
20 significant losses and damages.

21 **PLAINTIFF'S CLASS ACTION ALLEGATIONS**

22 31. Plaintiff brings this action as a class action pursuant to Federal Rule of Civil Procedure
23 23(a) and (b)(3) on behalf of a Class, consisting of all those who purchased or otherwise acquired
24 GoPro common shares traded on the NASDAQ during the Class Period (the "Class") and were
25 damaged upon the revelation of the alleged corrective disclosures. Excluded from the Class are
26 Defendants herein, the officers and directors of the Company, at all relevant times, members of their
27
28

1 immediate families and their legal representatives, heirs, successors or assigns and any entity in which
2 Defendants have or had a controlling interest.

3 32. The members of the Class are so numerous that joinder of all members is impracticable.
4 Throughout the Class Period, GoPro common shares were actively traded on the NASDAQ. While the
5 exact number of Class members is unknown to Plaintiff at this time and can be ascertained only through
6 appropriate discovery, Plaintiff believes that there are hundreds or thousands of members in the
7 proposed Class. Record owners and other members of the Class may be identified from records
8 maintained by GoPro or its transfer agent and may be notified of the pendency of this action by mail,
9 using the form of notice similar to that customarily used in securities class actions.
10

11 33. Plaintiff's claims are typical of the claims of the members of the Class as all members of
12 the Class are similarly affected by Defendants' wrongful conduct in violation of federal law that is
13 complained of herein.
14

15 34. Plaintiff will fairly and adequately protect the interests of the members of the Class and
16 has retained counsel competent and experienced in class and securities litigation. Plaintiff has no
17 interests antagonistic to or in conflict with those of the Class.
18

19 35. Common questions of law and fact exist as to all members of the Class and predominate
20 over any questions solely affecting individual members of the Class. Among the questions of law and
21 fact common to the Class are:

- 22 • whether the federal securities laws were violated by Defendants' acts as alleged
23 herein;
- 24 • whether statements made by Defendants to the investing public during the Class
25 Period misrepresented material facts about the financial condition, business,
26 operations, and management of GoPro;
- 27 • whether Defendants' public statements to the investing public during the Class
28 Period omitted material facts necessary to make the statements made, in light of
the circumstances under which they were made, not misleading;
- whether Defendant Woodman caused GoPro to issue false and misleading SEC
filings and public statements during the Class Period;

- 1 • whether Defendants acted knowingly or recklessly in issuing false and misleading SEC filings and public statements during the Class Period;
- 2 • whether the prices of GoPro common shares during the Class Period were artificially inflated because of the Defendants' conduct complained of herein; and
- 3 • whether the members of the Class have sustained damages and, if so, what is the proper measure of damages.

4
5 36. A class action is superior to all other available methods for the fair and efficient
6 adjudication of this controversy since joinder of all members is impracticable. Furthermore, as the
7 damages suffered by individual Class members may be relatively small, the expense and burden of
8 individual litigation make it impossible for members of the Class to individually redress the wrongs
9 done to them. There will be no difficulty in the management of this action as a class action.
10

11 37. Plaintiff will rely, in part, upon the presumption of reliance established by the fraud-on-
12 the-market doctrine in that:
13

- 14 • Defendants made public misrepresentations or failed to disclose material facts during the Class Period;
- 15 • the omissions and misrepresentations were material;
- 16 • GoPro common shares are traded in efficient markets;
- 17 • the Company's shares were liquid and traded with moderate to heavy volume during the Class Period;
- 18 • the Company traded on the NASDAQ, and was covered by multiple analysts;
- 19 • the misrepresentations and omissions alleged would tend to induce a reasonable investor to misjudge the value of the Company's common shares; and
- 20 • Plaintiff and members of the Class purchased and/or sold GoPro common shares between the time the Defendants failed to disclose or misrepresented material facts and the time the true facts were disclosed, without knowledge of the omitted or misrepresented facts.

21
22 38. Based upon the foregoing, Plaintiff and the members of the Class are entitled to a
23 presumption of reliance upon the integrity of the market.
24

25 39. Alternatively, Plaintiff and the members of the Class are entitled to the presumption of
26 reliance established by the Supreme Court in *Affiliated Ute Citizens of the State of Utah v. United*
27
28

1 *States*, 406 U.S. 128, 92 S. Ct. 2430 (1972), as Defendants omitted material information in their Class
2 Period statements in violation of a duty to disclose such information, as detailed above.

3 **COUNT I**

4 **Violation of Section 10(b) of the Exchange Act and Rule 10b-5**
5 **Against All Defendants**

6 40. Plaintiff repeats and realleges each and every allegation contained above as if fully set
7 forth herein.

8 41. This Count is asserted against GoPro and Defendant Woodman and is based upon
9 Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder by the
10 SEC.
11

12 42. During the Class Period, GoPro and Defendant Woodman, individually and in concert,
13 directly or indirectly, disseminated or approved the false statements specified above, which they knew
14 or deliberately disregarded were misleading in that they contained misrepresentations and failed to
15 disclose material facts necessary in order to make the statements made, in light of the circumstances
16 under which they were made, not misleading.
17

18 43. GoPro and Defendant Woodman violated §10(b) of the 1934 Act and Rule 10b-5 in that
19 they:

- 20
- 21 • employed devices, schemes and artifices to defraud;
 - 22 • made untrue statements of material facts or omitted to state material facts
23 necessary in order to make the statements made, in light of the circumstances
24 under which they were made, not misleading; or
 - 25 • engaged in acts, practices and a course of business that operated as a fraud or
26 deceit upon plaintiff and others similarly situated in connection with their
27 purchases of GoPro common shares during the Class Period.

28 44. GoPro and Defendant Woodman acted with scienter in that they knew that the public
documents and statements issued or disseminated in the name of GoPro were materially false and
misleading; knew that such statements or documents would be issued or disseminated to the investing

1 public; and knowingly and substantially participated, or acquiesced in the issuance or dissemination of
2 such statements or documents as primary violations of the securities laws. These Defendants by virtue
3 of their receipt of information reflecting the true facts of GoPro, their control over, and/or receipt and/or
4 modification of GoPro allegedly materially misleading statements, and/or their associations with the
5 Company which made them privy to confidential proprietary information concerning GoPro,
6 participated in the fraudulent scheme alleged herein.
7

8 45. Defendant Woodman, who is a senior officer and/or director of the Company, had actual
9 knowledge of the material omissions and/or the falsity of the material statements set forth above, and
10 intended to deceive Plaintiff and the other members of the Class, or, in the alternative, acted with
11 reckless disregard for the truth when he failed to ascertain and disclose the true facts in the statements
12 made by him or by other GoPro personnel to members of the investing public, including Plaintiff and
13 the Class.
14

15 46. As a result of the foregoing, the market price of GoPro common shares was artificially
16 inflated during the Class Period. In ignorance of the falsity of GoPro's and Defendant Woodman's
17 statements, Plaintiff and the other members of the Class relied on the statements described above and/or
18 the integrity of the market price of GoPro common shares during the Class Period in purchasing GoPro
19 common shares at prices that were artificially inflated as a result of GoPro's and Defendant Woodman's
20 false and misleading statements.
21

22 47. Had Plaintiff and the other members of the Class been aware that the market price of
23 GoPro common shares had been artificially and falsely inflated by GoPro's and Defendant Woodman's
24 misleading statements and by the material adverse information which GoPro and Defendant Woodman
25 did not disclose, they would not have purchased GoPro's common shares at the artificially inflated
26 prices that they did, or at all.
27
28

1 48. As a result of the wrongful conduct alleged herein, Plaintiff and other members of the
2 Class have suffered damages in an amount to be established at trial.

3 49. By reason of the foregoing, GoPro and Defendant Woodman have violated Section 10(b)
4 of the 1934 Act and Rule 10b-5 promulgated thereunder and are liable to the plaintiff and the other
5 members of the Class for substantial damages which they suffered in connection with their purchase of
6 GoPro common shares during the Class Period.
7

8 COUNT II

9 **Violation of Section 20(a) of the Exchange Act** 10 **Against Defendant Woodman**

11 50. Plaintiff repeats and realleges each and every allegation contained in the foregoing
12 paragraphs as if fully set forth herein.

13 51. During the Class Period, Defendant Woodman participated in the operation and
14 management of GoPro, and conducted and participated, directly and indirectly, in the conduct of
15 GoPro's business affairs. Because of his senior position, he knew the adverse non-public information
16 regarding the performance of GoPro's Karma drone.
17

18 52. As an officers and/or director of a publicly owned company, Defendant Woodman had a
19 duty to disseminate accurate and truthful information with respect to GoPro's financial condition and
20 results of operations, and to correct promptly any public statements issued by GoPro which had become
21 materially false or misleading.
22

23 53. Because of his position of control and authority as a senior officer, Defendant Woodman
24 was able to, and did, control the contents of the various reports, press releases and public filings which
25 GoPro disseminated in the marketplace during the Class Period. Throughout the Class Period,
26 Defendant Woodman exercised his power and authority to cause GoPro to engage in the wrongful acts
27 complained of herein. Defendant Woodman, therefore, was a "controlling person" of GoPro within the
28

1 meaning of Section 20(a) of the Exchange Act. In this capacity, he participated in the unlawful conduct
2 alleged which artificially inflated the market price of GoPro common shares.

3 54. By reason of the above conduct, Defendant Woodman is liable pursuant to Section 20(a)
4 of the Exchange Act for the violations committed by GoPro.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiff demands judgment against Defendants as follows:

7
8 A. Determining that the instant action may be maintained as a class action under Rule 23 of
9 the Federal Rules of Civil Procedure, and certifying Plaintiff as the Class representative;

10 B. Requiring Defendants to pay damages sustained by Plaintiff and the Class by reason of
11 the acts and transactions alleged herein;

12 C. Awarding Plaintiff and the other members of the Class prejudgment and post- judgment
13 interest, as well as their reasonable attorneys' fees, expert fees and other costs; and

14 D. Awarding such other and further relief as this Court may deem just and proper.

15 **DEMAND FOR TRIAL BY JURY**

16 Plaintiff hereby demands a trial by jury.

17 Dated: November 16, 2016

18 Respectfully submitted,

19 **POMERANTZ LLP**

20
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22 *Attorneys for Plaintiff*
23
24
25
26
27
28

CERTIFICATION PURSUANT TO FEDERAL SECURITIES LAWS

1. I make this declaration pursuant to Section 27(a)(2) of the Securities Act of 1933 (“Securities Act”) and/or Section 21D(a)(2) of the Securities Exchange Act of 1934 (“Exchange Act”) as amended by the Private Securities Litigation Reform Act of 1995.
2. I have reviewed a Complaint against GoPro, Inc. (“GoPro” or the “Company”) , and authorize the filing of a comparable complaint on my behalf.
3. I did not purchase or acquire GoPro securities at the direction of plaintiffs’ counsel or in order to participate in any private action arising under the Securities Act or Exchange Act.
4. I am willing to serve as a representative party on behalf of a Class of investors who purchased or acquired GoPro securities during the class period, including providing testimony at deposition and trial, if necessary. I understand that the Court has the authority to select the most adequate lead plaintiff in this action.
5. To the best of my current knowledge, the attached sheet lists all of my transactions in GoPro securities during the Class Period as specified in the Complaint.
6. During the three-year period preceding the date on which this Certification is signed, I have not sought to serve as a representative party on behalf of a class under the federal securities laws.
7. I agree not to accept any payment for serving as a representative party on behalf of the class as set forth in the Complaint, beyond my pro rata share of any recovery, except such reasonable costs and expenses directly relating to the representation of the class as ordered or approved by the Court.
8. I declare under penalty of perjury that the foregoing is true and correct.

Name

Print Name Anton Bielousov

Acquisitions

Configurable list (if none enter none)

Date Acquired	Number of Shares Acquired	Price per Share Acquired
October 31, 2016	90	12.74

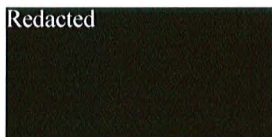
Sales

Configurable list (if none enter none)

Date Sold	Number of Shares Sold	Price per Share Sold
November 4, 2016	90	11.00

Documents & Message

Upload your brokerage statements showing your individual purchase and sale orders.

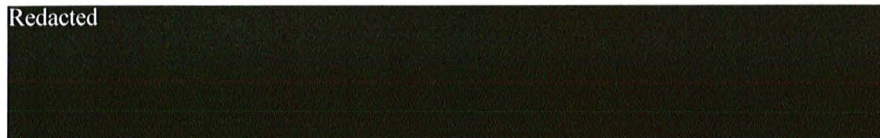


Signature

A handwritten signature in black ink, appearing to read "Anton Bielousov".

Full Name Anton Bielousov

Redacted



GOPRO, INC. (GPRO)

BIELOUSOV, ANTON

LIST OF PURCHASES AND SALES

DATE	PURCHASE OR SALE	NUMBER OF SHS/UTS	PRICE PER SH/UT
10/31/2016	PURCHASE	90	\$12.7400
11/04/2016	SALE	90	\$11.0000

JS-CAND 44 (Rev. 07/16)

CIVIL COVER SHEET

The JS-CAND 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
ANTON BIELOUSOV, Individually and on Behalf of All Others Similarly Situated,
(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)
(c) Attorneys (Firm Name, Address, and Telephone Number)
POMERANTZ LLP, Jennifer Pafiti (SBN 282790), 468 North Camden Drive, Beverly Hills, CA 90210, Telephone: (818) 532-6499, E-mail: jpafiti@pomlaw.com

DEFENDANTS
GOPRO, INC. and NICHOLAS D. WOODMAN
County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)
 NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
 Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC § 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC § 158 <input type="checkbox"/> 423 Withdrawal 28 USC § 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC § 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC § 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input checked="" type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation-Transfer	<input type="checkbox"/> 8 Multidistrict Litigation-Direct File
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VI. CAUSE OF ACTION
 Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
 §§10(b) and 20(a) of the Exchange Act (15 U.S.C. §§78j(b) and §78t(a)) and Rule 10b-5 promulgated thereunder by the SEC (17 C.F.R. §240.10b-5).
 Brief description of cause:
 Violation of the federal securities laws.

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions): JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)
 (Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE: 11/16/2016 SIGNATURE OF ATTORNEY OF RECORD: /s/ Jennifer Pafiti

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [GoPro Facing Securities Class Action Over Karma Drone Problems](#)
