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DAVID M. FURBUSH (SBN 083447)  
MEREDITH N. LANDY (SBN 136489)  
DALE M. EDMONDSON (SBN 189793)  
O'MELVENY & MYERS LLP  
2765 Sand Hill Road  
Menlo Park, California 94025-7019  
Telephone: (650) 473-2600  
Facsimile: (650) 473-2601  
DFurbush@omm.com  
MLandy@omm.com  
DEdmondson@omm.com

Attorneys for Defendants  
Magma Design Automation, Inc.,  
Rajeev Madhavan, Gregory C. Walker and  
Roy E. Jewell

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RICHARD W. WIERING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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

THE CORNELIA I. CROWELL GST  
TRUST, On Behalf Of Itself and All  
Others Similarly Situated,

Plaintiff,

v.

MAGMA DESIGN AUTOMATION,  
INC., RAJEEV MADHAVAN,  
GREGORY C. WALKER, ROY E.  
JEWELL,

Defendants.

Case No. C 05 2394 CRB

STIPULATION AND ~~[PROPOSED]~~  
ORDER REGARDING SCHEDULING  
AND RELATED MATTERS

Complaint Filed: June 13, 2005  
Jury Trial Demanded

Pursuant to F.R. Civ. P. 16(e), Civil L.R. 23-1(b), and the Manual for Complex  
Litigation, Fourth §§ 11.12, 11.21 and 31 (2004), the parties stipulate, and the Court  
hereby orders, as follows:

CONSOLIDATION OF RELATED CASES

1. All related actions that are subsequently filed in, or transferred to, this  
District shall be consolidated into this action for pretrial purposes. This Order shall apply  
to every such related action, absent order of the Court. A party that objects to such

STIPULATION AND [PROPOSED] ORDER  
CASE NO. C 05 2394 CRB

1 consolidation, or to any other provision of this Order, must file an application for relief  
2 from this Order within thirty (30) days after the date on which a copy of the order is  
3 mailed to the party's counsel.

4 2. This Order is entered without prejudice to the rights of any party to apply  
5 for severance of any claim or action, for good cause shown.

6 MASTER DOCKET AND CAPTION

7 3. The docket in Civil Action No. C-05-2394 shall constitute the Master  
8 Docket for this action.

9 4. Every pleading in this proceeding shall bear the following caption:

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

12 IN RE MAGMA DESIGN 13 AUTOMATION, INC. SECURITIES 14 LITIGATION	}	Case No. C-05-2934-CRB
15 THIS DOCUMENT RELATES TO:	}	<u>CLASS ACTION</u>

16  
17 5. The file in Civil Action No. C-05-2934 shall constitute a Master File for  
18 every action consolidated into this action. When a pleading is intended to be applicable  
19 to all actions to which this Order is applicable, the phrase "All Actions" shall appear  
20 immediately after the words "This Document Relates To:" in the caption set out above.  
21 When a pleading is intended to be applicable only to some, but not all, of such actions, the  
22 document shall list, immediately after the phrase "This Document Relates To:", the docket  
23 number for each individual action to which the document applies, along with the last  
24 name of the first-listed plaintiff in any such action.

25 6. The parties shall file a Notice of Related Cases pursuant to Civil L.R. 3-12  
26 whenever a case that should be consolidated into this action is filed in, or transferred to,  
27 this District. If the Court determines that the case is related, the clerk shall:

28 / / /

- 1 a. Place a copy of this Order in the separate file for such action;
- 2 b. Serve on plaintiff's counsel in the new case a copy of this Order;
- 3 c. Direct that this Order be served upon any new defendant(s) in the
- 4 new case); and
- 5 d. Make the appropriate entry in the Master Docket.

6 LEAD PLAINTIFF'S COUNSEL

7 7. After the Court has designated a Lead Plaintiff, pursuant to 15 U.S.C.  
8 § 78u-4(a)(3)(B), the Lead Plaintiff shall designate a law firm or firms to serve,  
9 with approval of the Court, as Lead Plaintiff's Counsel, pursuant to 15 U.S.C.  
10 § 78u-4(a)(3)(B)(v). Following the Court's approval of the selected Lead Plaintiff's  
11 Counsel, such counsel shall have authority to speak for, and enter into agreements on  
12 behalf of, plaintiffs in all matters regarding pretrial procedures, discovery, and settlement  
13 negotiations. Lead Plaintiff's Counsel shall manage the prosecution of this litigation to  
14 avoid duplicative or unproductive activities. Lead Plaintiff's Counsel shall be responsible  
15 for coordination of all activities and appearances on behalf of plaintiffs and for  
16 dissemination of notices and orders. Lead Plaintiff's Counsel shall maintain a master  
17 service list of all parties and counsel.

18 8. Defendants' counsel may rely upon agreements made with Lead Plaintiff's  
19 Counsel. Such agreements shall be binding on all plaintiffs. Service on Lead Plaintiff's  
20 Counsel shall constitute service on all plaintiffs.

21 9. Any counsel of record for a party in this action who is not a member of the  
22 Bar of this District is hereby admitted to practice *pro hac vice* in this action.

23 PLEADINGS AND MOTIONS

24 10. Defendants are not required to respond to the complaint in this action or any  
25 action consolidated into this action, other than a consolidated complaint or a complaint  
26 designated as the operative complaint by Lead Plaintiff's Counsel.

27 11. Lead Plaintiff shall file a consolidated complaint within sixty (60) days  
28 of the entry of an order appointing Lead Plaintiff and Lead Counsel in this Consolidated

1 Action, unless otherwise agreed upon by the parties. The consolidated complaint shall  
2 supersede all existing complaints filed in the Action.

3 12. Defendants shall respond to the consolidated complaint within forty-five  
4 (45) days after service (or, in the event that Lead Plaintiff's Counsel designates an  
5 existing complaint as the operative complaint, within forty-five (45) days after service  
6 of written notice of such designation), unless otherwise agreed upon by the parties. If  
7 defendants file any motions directed at the operative complaint, the opposition brief shall  
8 be filed within forty five (45) days of that motion, with the reply brief filed thirty (30)  
9 days thereafter, unless otherwise agreed upon by the parties.

10 13. Counsel for the parties shall notify their clients of their document  
11 preservation obligations pursuant to the federal securities laws and the Local Rules.

12 Dated: June 29, 2005

O'MELVENY & MYERS LLP

13  
14 By: David M. Furbush / MLK

15 David M. Furbush

16 Attorneys for Defendants  
17 Magma Design Automation, Inc., Rajeev  
Madhavan, Gregory C. Walker, Roy E. Jewell

18 Dated: June 29, 2005

MILBERG WEISS BERSHAD &  
SCHULMAN LLP

19  
20 By: Elizabeth P. Lin / MLK

21 Elizabeth P. Lin

22 Attorneys for Plaintiff  
23 The Cornelia I. Crowell GST Trust, On  
24 Behalf Of Itself and All Others Similarly  
25 Situated

26 I, David M. Furbush, hereby attest that Elizabeth P. Lin of Milberg Weiss Bershad  
27 & Schulman LLP has concurred in this filing.

28 David M. Furbush / MLK

David M. Furbush

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June 30, 2005

Hon. Charles R. Breyer  
United States District

