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 10 Lead Counsel for the Derivative Plaintiffs
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12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**

15 IN RE VERIFONE HOLDINGS, INC. SHAREHOLDER DERIVATIVE 16 LITIGATION 17) Master File No. C 07-06347 MHP))) STIPULATION AND PROPOSED) ORDER ENLARGING PLAINTIFFS') TIME TO FILE SECOND AMENDED) CONSOLIDATED SHAREHOLDER) DERIVATIVE COMPLAINT 18 This Document Relates To: No. CV 07 6347 (King); No. CV 08 1132 (Hilborn); No. CV 19 08 1133 (Patel); No. CV 08 1301 (Lemmond).) Judge: The Hon. Marilyn H. Patel) Courtroom: 15)))
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 22 WHEREAS, an Order was entered by the Court on May 26, 2009 granting nominal defendant
 23 VeriFone Holdings Inc.'s ("VeriFone") Motion to Dismiss Plaintiffs' Consolidated Amended
 24 Shareholder Derivative Complaint (the "Complaint");

25 WHEREAS, the May 26, 2009 Order provides that Plaintiffs shall file their Second Amended
 26 Consolidated Shareholder Derivative Complaint within thirty (30) days of the date of the Order;

1 WHEREAS, the May 26, 2009 Order provides that VeriFone shall file a response within thirty
2 (30) days thereafter;

3 WHEREAS, the May 26, 2009 Order provides that Plaintiffs “should gain access to certain of
4 VeriFone’s documents and records for the Relevant Period” pursuant to 8 Del. C. § 220;

5 WHEREAS, shareholder plaintiff Charles R. King made a written demand on VeriFone, that
6 was received by VeriFone on June 10, 2009, pursuant to 8 Del. C. § 220, to inspect VeriFone’s books
7 and records;

8 WHEREAS, Plaintiffs and Defendants have consulted and agreed to extend the time for the
9 Plaintiffs to file their Second Amended Consolidated Shareholder Derivative Complaint;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiffs, by
11 and through their counsel, and Defendants, by and through their counsel, that:

12 1. Plaintiffs shall file their Second Amended Consolidated Shareholder Derivative
13 Complaint within thirty (30) days of receiving all of the books and records they are entitled to inspect
14 from VeriFone pursuant to 8 Del. C. § 220.

15 2. VeriFone shall file a response within thirty (30) days thereafter.

16 IT IS SO STIPULATED.

17 Dated: June 11, 2009

/s/ Arthur L. Shingler III
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Lead Counsel for the Derivative Plaintiffs

Dated: June 11, 2009

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Attorneys for Verifone Holdings, Inc., and the
Individual Verifone Defendants

* * *

ORDER

The foregoing stipulation is approved
AND IS SO ORDERED.

Dated: June 12, 2009

Hon. Ma
UNITED
Judge Marilyn H. Patel



1 I, Arthur L. Shingler, III, am the ECF user whose User ID and Password are being used to
2 file this STIPULATION AND [PROPOSED] ORDER ENLARGING PLAINTIFFS' TIME TO
3 FILE SECOND AMENDED CONSOLIDATED SHAREHOLDER DERIVATIVE COMPLAINT.
4

5 In compliance with General Order 45, X.B, I hereby attest that the other signatories listed have
6 concurred in this filing.

7 Dated: June 11, 2009

/s/ Arthur L. Shingler III
Arthur L. Shingler III (SBN 181719)