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10 Attorneys for CADENCE DESIGN SYSTEMS,  
 11 INC., MICHAEL J. FISTER, KEVIN S.  
 12 PALATNIK, WILLIAM PORTER and KEVIN  
 BUSHBY

13  
 14 UNITED STATES DISTRICT COURT  
 15 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17  
 18 In re CADENCE DESIGN SYSTEMS, INC.  
 19 SECURITIES AND DERIVATIVE  
 LITIGATION

CASE NO. C-08-4966 SC

CLASS ACTION

20 STIPULATION AND [PROPOSED] ORDER  
 21 SHORTENING TIME [CIV. L.R. 6-2 & 7-12]

22 This Document Relates To:

23 ALL CASES  
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1                    **STIPULATION AND [PROPOSED] SCHEDULING ORDER SHORTENING TIME**

2                    WHEREAS, the first complaint in these related actions was filed on October 29, 2008;

3                    WHEREAS, on March 4, 2009, the Court entered an Order consolidating three related  
4 securities litigation cases, appointing Alaska Electrical Pension Fund as the lead plaintiff, and  
5 approving the selection of Lead Counsel (the “Securities Action”);

6                    WHEREAS, on April 24, 2009, Lead Plaintiff in the Securities Action filed a consolidated  
7 complaint against defendants Cadence Design Systems, Inc. (“Cadence”), and Michael J. Fister,  
8 Kevin S. Palatnik, William Porter, and Kevin Bushby (together with Cadence, the “Securities Action  
9 Defendants”);

10                    WHEREAS, on September 11, 2009, the Court entered an order dismissing the consolidated  
11 complaint in the Securities Action without prejudice; on October 13, 2009, Lead Plaintiff in the  
12 Securities Action filed an amended consolidated complaint (the “First Amended Complaint”); and on  
13 March 2, 2010, the Court entered an order denying Defendants’ motion to dismiss the First Amended  
14 Complaint in the Securities Action;

15                    WHEREAS, in 2010, shareholder derivative actions captioned *Hamilton v. Fister, et al.*, Case  
16 No. CV-10-01849-SC (filed April 28, 2010), *Samani v. Fister, et al.*, Case No. CV-10-3607-SC and  
17 *Powers v. Fister, et al.*, Case No. CV-10-3627-SC (both filed August 16, 2010) (together, the  
18 “Derivative Actions”), were filed on behalf of Cadence against Michael J. Fister, Kevin S. Palatnik,  
19 William Porter, Kevin Bushby, James J. Cowie, R.L. Smith McKeithen, James S. Miller, John B.  
20 Shoven, Lip-Bu Tan, Alberto Sangiovanni-Vincentelli, Donald L. Lucas, Roger S. Siboni, George M.  
21 Scalise, and John A.C. Swainson (collectively, the “Derivative Action Individual Defendants”),  
22 asserting factual allegations related to those in the Securities Action;

23                    WHEREAS, on July 7, 2010, the Court entered an order staying the Securities Action in its  
24 entirety to facility the parties’ efforts to reach a negotiated resolution, and on August 25, 2010, the  
25 parties participated in a mediation with the Honorable Edward A. Infante (Ret.), but did not reach a  
26 negotiated resolution of this case;

27                    WHEREAS, since that time, the parties continued their settlement discussions;

28                    WHEREAS, on September 24, 2010, the Court entered an Order relating the Derivative

1 Actions to the Securities Action, staying the Derivative Actions pending the parties' ongoing  
2 settlement discussions, and scheduling a case management conference on January 7, 2011;

3 WHEREAS, on January 7, 2011, the Court entered an Order continuing the case management  
4 conference until July 8, 2011 and extending the litigation stay in order to facilitate the parties'  
5 ongoing settlement efforts;

6 WHEREAS, on February 8, 2011, the parties participated in a further mediation session with  
7 Judge Infante (Ret.), which resulted in an agreement in principle for a negotiated resolution of the  
8 Securities Action and the Derivative Actions;

9 WHEREAS, on June 7, 2011, the parties to the Securities Action executed a Stipulation of  
10 Settlement ("Securities Stipulation");

11 WHEREAS, on June 7, 2011, the parties to the Derivative Actions executed a Stipulation of  
12 Settlement ("Derivative Stipulation");

13 WHEREAS, concurrently herewith, Plaintiffs in the Securities Action have filed a motion  
14 with the Court requesting an order: preliminarily approving the Securities Stipulation and settlement;  
15 certifying a Class (for settlement purposes only); scheduling a hearing to determine whether the  
16 settlement of the Securities Action is fair, reasonable, and adequate to the Class; and approving the  
17 proposed Notice of Pendency and Proposed Settlement of Class Action (the "Securities Motion");

18 WHEREAS, concurrently herewith, Plaintiffs in the Derivative Actions have filed a motion  
19 with the Court requesting an order: preliminarily approving the Derivative Stipulation and settlement;  
20 scheduling a hearing to determine whether the proposed settlement of the Derivative Actions is fair,  
21 reasonable, and adequate to Cadence and Current Cadence Stockholders (as defined in the Derivative  
22 Stipulation); and approving the proposed Notice of Settlement and Summary Notice of Settlement  
23 (the "Derivative Motion," and, collectively with the Securities Motion, the "Motions");

24 WHEREAS, Civil Local Rule 7-2(a) requires that a motion be noticed for a date not less than  
25 35 days after service of the motion;

26 WHEREAS, the Securities Action Defendants do not oppose the Securities Motion, Cadence  
27 and the Derivative Action Individual Defendants do not oppose the Derivative Motion, and the  
28 parties do not anticipate any other opposition to the Motions;

1           WHEREAS, the parties, through counsel, believe that it is in the best interests of the parties  
2 and the Court, and in the interests of justice, to expedite the Court's consideration of the Motions and  
3 preliminary approval of the settlements of the Securities Action and the Derivative Action;

4           WHEREAS, the parties, through counsel, believe that the Motions are appropriate for  
5 resolution without hearing, unless the Court believes that a hearing would be beneficial;

6           WHEREAS, in accordance with Local Rule 6-2(a)(2), the time modifications made to date in  
7 this action are as follows:

- 8           • On November 25, 2008, pursuant to stipulation, the Court entered an Order enlarging  
9 defendants' time to respond to the complaint in the Securities Action (Docket No. 7);
- 10          • On February 2, 2009, pursuant to stipulation, the Court entered an Order vacating a case  
11 management conference scheduled for February 6, 2009 (Docket No. 34);
- 12          • On March 10, 2009, pursuant to stipulation, the Court entered an Order setting a schedule  
13 for the filing of a consolidated complaint in the Securities Action, defendants' responsive  
14 pleadings, and any responses thereto (Docket No. 38);
- 15          • On October 20, 2009, pursuant to stipulation, the Court entered an Order setting a  
16 schedule for defendants' responsive pleadings to the First Amended Complaint (and any  
17 responses thereto) (Docket No. 56);
- 18          • On March 16, 2010, pursuant to stipulation, the Court entered an Order enlarging  
19 defendants' time to answer the First Amended Complaint (Docket No. 75);
- 20          • On June 21, 2010, pursuant to stipulation, the Court entered an Order continuing the  
21 hearing on defendants' Motion for Partial Summary Judgment in the Securities Action  
22 until July 9, 2010 (Docket No. 125);
- 23          • On July 7, 2010, pursuant to stipulation, the Court entered an Order staying the Securities  
24 Action (Docket No. 131);
- 25          • On September 24, 2010, the Court entered an Order staying the Derivative Actions and  
26 scheduling a case management conference for January 7, 2011 (Docket No. 136);

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DATED: June 15, 2011

HOGAN LOVELLS US LLP

By:                     /s/ Douglas M. Schwab                      
Douglas M. Schwab

Attorneys for William Porter, Kevin S. Palatnik, R.L.  
Smith McKeithen, James S. Miller and James J. Cowie

DATED: June 15, 2011

DLA PIPER US LLP

By:                     /s/ Shirli Fabbri Weiss                      
Shirli Fabbri Weiss

Attorneys for Kevin S. Bushby

DATED: June 15, 2011

THE WEISER LAW FIRM, P.C.

By:                     /s/ Kathleen A. Herkenhoff                      
Kathleen A. Herkenhoff

Attorneys for Walter Hamilton

DATED: June 15, 2011

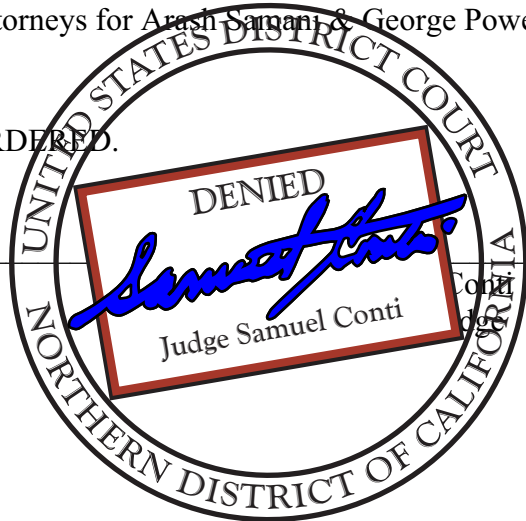
KESSLER TOPAZ MELTZER & CHECK LLP

By:                     /s/ Eric Zagar                      
Eric Zagar

Attorneys for Arash Samani & George Powers

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:         6/20/11        





1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare that I am employed in the County of Santa Clara, State of  
3 California; I am over the age of eighteen years and am not a party to this action; my business address  
4 is 1881 Page Mill Road, Palo Alto, California, 94304, in said County and State. On the date  
5 indicated below, I served the within:

6 **STIPULATION AND [PROPOSED] ORDER SHORTENING TIME [CIV. L.R. 6-2 & 7-12]**

7 To all interested parties as follows:

8  
9  **BY ECF (ELECTRONIC CASE FILING):** I e-filed the above-detailed documents  
10 utilizing the United States District Court, Northern District of California’s mandated ECF  
11 (Electronic Case Filing) service on December 30, 2010. Counsel of record are required by the  
12 Court to be registered e-filers, and as such are automatically e-served with a copy of the  
13 documents upon confirmation of e-filing.  
14

15 I certify under penalty of perjury that the foregoing is true and correct, that the foregoing  
16 document(s) were printed on recycled paper, and that this Certificate of Service was executed by me  
17 on June 15, 2011, at Palo Alto, California.  
18

19 /s/ Melinda A. McCrory

20 Melinda A. McCrory

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