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10 [Proposed] Lead Counsel for Plaintiffs

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

13 CHANGHUI HU, Individually and on Behalf)
 of All Others Similarly Situated,)
 14)
 Plaintiff,)
 15)
 vs.)
 16 CADENCE DESIGN SYSTEMS, INC., et al.,)
 17)
 Defendants.)

No. 3:08-cv-04966-SC

CLASS ACTION

18)
) STIPULATION AND [PROPOSED] ORDER
) RE: CASE MANAGEMENT CONFERENCE
) AND BRIEFING SCHEDULE

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1 For the reasons set forth herein, proposed lead plaintiffs Changhui Hu, Anchorage Police and
2 Fire Retirement System and Alaska Electrical Pension Fund on behalf of themselves and others
3 similarly situated, and defendants Cadence Design Systems, Inc. (“Cadence” or the “Company”),
4 Michael J. Fister, John B. Shoven, Kevin S. Palatnik, and William Porter (collectively the
5 “defendants”) hereby stipulate and agree, and request that the Court vacate the February 6, 2009
6 Case Management Conference.

7 WHEREAS, on October 29, 2008, plaintiff Changhui Hu filed the above captioned case *Hu*
8 *v. Cadence Design Systems, Inc., et al.*, 3:08-cv-04966-SC.

9 WHEREAS on October 29, 2008, the Court set a Case Management Conference for February
10 6, 2009, at 10:00 a.m.

11 WHEREAS on October 30, 2008, the plaintiff in *Hu v. Cadence Design Systems, Inc., et al.*,
12 3:08-cv-04966-SC caused notice to be published.

13 WHEREAS pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15
14 U.S.C. §78u-4, *et seq.*, any member of the proposed class who wishes to serve as the lead plaintiff
15 must move the Court for appointment as lead plaintiff within 60 days of the publication of notice.

16 WHEREAS on November 24, 2008, plaintiff Hu and defendants entered into a stipulation by
17 which defendants are not required to respond to any complaint until after a lead plaintiff is appointed
18 and a consolidated complaint is filed.

19 WHEREAS on December 29, 2008, within 60 days of the publication of notice of the first-
20 filed action, 3 motions for consolidation, appointment as lead plaintiff and approval of lead
21 plaintiff’s selection of counsel were filed.

22 WHEREAS, the undersigned believes that the interests of judicial efficiency and the
23 conservation of judicial and private resources would be best served by the rescheduling of the Case
24 Management Conference until after the Court appoints a lead plaintiff.

25 NOW THEREFORE, the parties to this action, by and through their attorneys, hereby
26 stipulate and agree that:


27 1. The Case Management Conference currently scheduled for February 6, 2009 is
28 vacated.

1 2. Lead plaintiff and defendants shall confer within seven days of the appointment of
2 lead plaintiff to establish a briefing schedule concerning the filing of a consolidated complaint and
3 defendants' response to the consolidated complaint.

4 IT IS SO STIPULATED.

5 DATED: January 28, 2009

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[Proposed] Lead Counsel for Plaintiffs

17 DATED: January 23 2009

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1 DATED: January __, 2009

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10 DATED: January __, 2009

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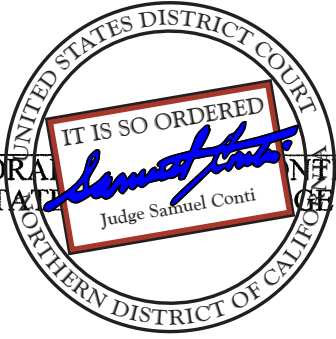
* * *

ORDER

24 IT IS SO ORDERED.

25 DATED: 2/2/09

26 THE HONORABLE Samuel Conti
27 UNITED STATES JUDGE Samuel Conti
28



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Mailing Information for a Case 3:08-cv-04966-SC

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Manual Notice List

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- (No manual recipients)