

1 COUGHLIN STOIA GELLER
 2 RUDMAN & ROBBINS LLP
 3 SHAWN A. WILLIAMS (213113)
 4 SHIRLEY H. HUANG (206854)
 5 JASON C. DAVIS (253370)
 6 100 Pine Street, Suite 2600
 7 San Francisco, CA 94111
 8 Telephone: 415/288-4545
 9 415/288-4534 (fax)
 10 shawnw@csgrr.com
 11 shirleyh@csgrr.com
 12 jasond@csgrr.com

Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

In re CADENCE DESIGN SYSTEMS, INC. SECURITIES LITIGATION)	No. CV-08-4966 SC
This Document Relates To:)	<u>CLASS ACTION</u>
ALL ACTIONS.)	STIPULATION AND [PROPOSED] ORDER REGARDING CASE SCHEDULE

15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 WHEREAS, the initial complaint in this action was filed on October 29, 2008;

2 WHEREAS, on March 4, 2009, the Court entered an Order Consolidating Cases, Appointing
3 Lead Plaintiff, and Approving Selection of Lead Counsel (“Order”);

4 WHEREAS, in the Order, the Court consolidated three related actions pending before the
5 Court: *Hu v. Cadence Design Systems, Inc., et al.*, C-08-4966 SC; *Vyas v. Cadence Design Systems,*
6 *Inc., et al.*, C-08-5027; and *Collins v. Cadence Design Systems, Inc., et al.*, C-08-5273;

7 WHEREAS, in the Order, the Court appointed Alaska Electrical Pension Fund (“Alaska
8 Electrical”) as the lead plaintiff;

9 WHEREAS, the Order requires the parties to submit a schedule for filing a consolidated
10 complaint and a schedule for responsive pleadings;

11 WHEREAS, Alaska Electrical intends to file a single consolidated complaint;

12 WHEREAS, the parties have met and conferred about a reasonable but expeditious schedule
13 for filing the amended, consolidated complaint and defendants’ responsive pleading as follows:

14 The parties hereto hereby STIPULATE and AGREE as follows subject to the approval of the
15 Court:

- 16 1. Lead plaintiff shall file a consolidated complaint no later than April 24, 2009;
- 17 2. Defendants shall have forty-five (45) days or until June 8, 2009 after the service of
18 the consolidated complaint to file a responsive pleading;
- 19 3. Lead plaintiff shall have forty-five (45) days or until July 23, 2009 after the service of
20 the responsive pleading to file an opposition; and
- 21 4. Defendants shall have twenty (20) days or until August 12, 2009 after service of the
22 opposition to file a reply.

23 DATED: March 10, 2009

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SHAWN A. WILLIAMS
SHIRLEY H. HUANG
JASON C. DAVIS

27 _____ /s/
SHIRLEY H. HUANG

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

Lead Counsel for Plaintiff

DATED: March 10, 2009

GIBSON, DUNN & CRUTCHER LLP
ETHAN DETTMER

/s/
ETHAN DETTMER

555 Mission Street, Suite 3000
San Francisco, CA 94105-2933
Telephone: 415/393-8200
415/393-8306 (fax)

WAYNE W. SMITH
3161 Michelson Drive
Irvine, CA 92612-4412
Telephone: 949/451-3800
949/451-4220 (fax)

TIMOTHY K. ROAKE
SALLY BERENS
1881 Page Mill Road
Palo Alto, CA 94304-1211
Telephone: 650/849-5300
650/849-5333 (fax)

Attorney for Defendants

I, Shirley H. Huang, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Case Schedule. In compliance with General Order 45, X.B., I hereby attest that Ethan Dettmer has concurred in this filing.

* * *

ORDER

Based on the Stipulation of the parties, and good case appearing therefore, IT IS HEREBY ORDERED:

1. Lead plaintiff shall file a consolidated complaint no later than April 24, 2009;
2. Defendants shall have forty-five (45) days or until June 8, 2009 after the service of the consolidated complaint to file a responsive pleading;

1 3. Lead plaintiff shall have forty-five (45) days or until July 23, 2009 after the service of
2 the responsive pleading to file an opposition; and

3 4. Defendants shall have twenty (20) days or until August 12, 2009 after service of the
4 opposition to file a reply.

5 IT IS SO ORDERED.

6 DATED: March 10, 2009



8 S:\CasesSD\Cadence 08\STP00057911.doc

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 CERTIFICATE OF SERVICE

2 I hereby certify that on March 10, 2009, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have
5 mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF
6 participants indicated on the attached Manual Notice List.

7 I certify under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on March 10, 2009.

9 _____/s/

10 SHIRLEY H. HUANG
11 COUGHLIN STOIA GELLER
12 RUDMAN & ROBBINS LLP
13 100 Pine Street, 26th Floor
14 San Francisco, CA 94111
15 Telephone: 415/288-4545
16 415/288-4534 (fax)
17 E-mail:shuang@csgrr.com
18
19
20
21
22
23
24
25
26
27
28

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

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jeffrey A. Berens**
jeff@dyerberens.com
- **Peter Arthur Binkow**
info@glancylaw.com,pbinkow@glancylaw.com
- **Ethan D. Dettmer**
edettmer@gibsondunn.com,psaunders@gibsondunn.com
- **Robert J. Dyer , III**
bob@dyerberens.com
- **Lionel Z. Glancy**
info@glancylaw.com
- **Michael M. Goldberg**
info@glancylaw.com
- **Shirley H. Huang**
shirleyh@csgrr.com,jdecena@csgrr.com,e_file_sf@csgrr.com,e_file_sd@csgrr.com
- **Matthew Paul Montgomery**
mattm@csgrr.com,e_file_sf@csgrr.com,e_file_sd@csgrr.com
- **Blair Allen Nicholas**
blairm@blbglaw.com,denab@blbglaw.com,kayem@blbglaw.com,kristinas@blbglaw.com
- **Brian O. O'Mara**
bo'mara@csgrr.com
- **Darren Jay Robbins**
e_file_sd@csgrr.com
- **Karen T. Rogers**
krogers@milberg.com,schang@milberg.com,cchaffins@milberg.com
- **Jeff S. Westerman**
jwesterman@milberg.com,schang@milberg.com,cchaffins@milberg.com
- **Shawn A. Williams**
shawnw@csgrr.com,travisd@csgrr.com,e_file_sf@csgrr.com,cwood@csgrr.com,e_file_sd@csgrr.com,aelishb@csgrr.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Catherine J. Kowalewski
Coughlin Stoa Geller Rudman & Robbins LLP
655 W Broadway #1900
San Diego, CA 92101