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6 Attorneys for Plaintiff Deepak Vyas
 7 [Additional Counsel on Signature Page]

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA

10 DEEPAK VYAS, Individually and on Behalf
 11 of All Others Similarly Situated,

Case No. C-08-5027 SC

12 Plaintiff,

CLASS ACTION

13 v.

**JOINT STIPULATION AND
 [PROPOSED] ORDER OF DISMISSAL
 WITHOUT PREJUDICE PURSUANT TO
 FRCivP 41(a)(1)**

14 CADENCE DESIGN SYSTEMS, INC.,
 15 MICHAEL J. FISTER, AND
 16 KEVIN S. PALATNIK,

17 Defendants.

18 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

19 WHEREAS, on November 4, 2008 plaintiff Deepak Vyas filed the above-captioned action
 20 on his own behalf and on behalf of all others similarly situated against Cadence Design Systems,
 21 Inc. (“Cadence”), Michael J. Fister and Kevin S. Palatnik, captioned *Vyas v. Cadence Design*
 22 *Systems, Inc., et. al.*, Case No. C-08-5027-SC (the “Action”);

23 WHEREAS, on March 4, 2009, the Court, pursuant to Federal Rule of Civil Procedure
 24 42(a)(2), entered an order consolidating the Action and two related securities actions – *Hu v.*
 25 *Cadence Design Systems, Inc., et al.*, No. C-08-4966 SC, and *Collins v. Cadence Design Systems,*
 26
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28 No: C-08-5027 SC

JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT PREJUDICE

1 *Inc., et al.*, No. C-08-5273 – into a single action captioned *In re Cadence Design Systems, Inc.*
2 *Securities Litigation*, Case No. C-08-4966 SC (the “Consolidated Action”);

3 WHEREAS, also on March 4, 2009, the Court entered an order appointing Alaska Electrical
4 Pension Fund as Lead Plaintiff, and approving Lead Plaintiff’s selection of Coughlin Stoia Geller
5 Rudman & Robbins LLP as Lead Counsel for plaintiffs and the class in the Consolidated Action;

6 WHEREAS, on April 24, 2009, Lead Plaintiff filed a Consolidated Complaint For Violations
7 of The Federal Securities Laws against defendants Cadence, Michael J. Fister, Kevin S. Palatnik,
8 William Porter and Kevin Bushby (collectively “Defendants”);

9 WHEREAS, on September 11, 2009, the Court entered an Order dismissing the Consolidated
10 Complaint, without prejudice, and allowing Lead Plaintiff thirty days from the date of the Order in
11 which to file an amended complaint;

12 WHEREAS, on October 14, 2009, Lead Plaintiff filed in the Consolidated Action a First
13 Amended Complaint For Violations of The Federal Securities Laws against the foregoing
14 Defendants;

15 WHEREAS, on March 2, 2010, the Court entered an Order denying Defendants’ motion to
16 dismiss the First Amended Complaint;

17 WHEREAS, on March 16, 2010, upon stipulations of the parties, the Court entered an Order
18 extending to April 30, 2010, the time for Defendants to answer the First Amended Complaint;

19 WHEREAS, plaintiff Deepak Vyas, after further investigation, no longer intends to pursue
20 the above-captioned Action at this time on his own behalf or on behalf of the putative class; and

21 WHEREAS, as of the date of this filing, Defendants have not served an answer to the
22 Complaint or moved for summary judgment;

23 NOW, THEREFORE, NOTICE IS HEREBY GIVEN that, pursuant to Rule 41(a)(1) of the
24 Federal Rules of Civil Procedure, Plaintiff Deepak Vyas voluntarily dismisses the above-captioned
25 Action, without prejudice, and the undersigned parties hereby stipulate and agree and respectfully
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1 request that the Court enter an order dismissing the above-captioned Action, without prejudice.
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3 IT IS SO STIPULATED.
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5 Dated: April 14, 2010

GLANCY BINKOW & GOLDBERG LLP

6 /s/ Michael Goldberg

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8 Michael Goldberg #188669
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Attorneys for Plaintiff Deepak Vyas

19 Dated: April 14, 2010

GIBSON, DUNN & CRUTCHER LLP

20 /s/ Sally J. Berens

21 Sally J. Berens
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23 Palo Alto, CA 94304
24 Telephone: (650) 849-5300
25 Facsimile: (650) 849-5333

Attorneys for Defendants



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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____, 2010

The Honorable Samuel Conti
United States District Judge

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**PROOF OF SERVICE BY ELECTRONIC POSTING
PURSUANT TO NORTHERN DISTRICT OF CALIFORNIA LOCAL
RULES AND ECF GENERAL ORDER NO. 45
AND BY MAIL ON ALL KNOWN NON-REGISTERED PARTIES**

5 I, the undersigned, say:

6 I am a citizen of the United States and am employed in the office of a member of the Bar of
7 this Court. I am over the age of 18 and not a party to the within action. My business address is 1801
8 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

9 On April 14, 2010, I served the following by posting such document electronically to the ECF
10 website of the United States District Court for the Northern District of California:

11 **JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL WITHOUT
12 PREJUDICE PURSUANT TO FRCivP 41(a)(1)**

13 on all parties as listed on the attached Court's Service List.

14 I certify under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct. Executed on April 14, 2010, at Los Angeles, California.

16 *S/ Michael Goldberg*

17 Michael Goldberg

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Mailing Information for a Case 3:08-cv-05027-SC

Electronic Mail Notice List

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

- **Anchorage Police and Fire Retirement System**
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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.

- (No manual recipients)

