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12 Lead Counsel for Plaintiffs

13 UNITED STATES DISTRICT COURT
 14
 15 NORTHERN DISTRICT OF CALIFORNIA

16 In re IMMERSION CORPORATION)	Master File No. 09-cv-04073-MMC
SECURITIES LITIGATION)	
_____)	<u>CLASS ACTION</u>
17 This Document Relates To:)	
18 ALL ACTIONS.)	STIPULATION AND PROPOSED ORDER
_____)	(i) EXTENDING TIME FOR FILING LEAD
)	PLAINTIFF'S AMENDED COMPLAINT
)	AND (ii) SETTING FORTH A BRIEFING
)	SCHEDULE FOR DEFENDANTS' MOTION
)	TO DISMISS

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1 WHEREAS, on April 9, 2010, Lead Plaintiff filed a Consolidated Complaint for Violation of
2 the Federal Securities Laws (“Complaint”);

3 WHEREAS, on June 15, 2010, Defendants filed a motion to dismiss the Complaint;

4 WHEREAS, on August 16, 2010, Lead Plaintiff filed a memorandum in opposition to
5 Defendants’ motion to dismiss;

6 WHEREAS, on September 27, 2010, Defendants filed a reply memorandum in support of
7 their motion to dismiss;

8 WHEREAS, on October 25, 2010, the Court deemed Defendants’ motion to dismiss suitable
9 for a decision on the papers submitted by the parties;

10 WHEREAS, on March 11, 2011, the Court issued an order granting Defendants’ motion to
11 dismiss the Complaint with leave to amend and allowing Lead Plaintiff until April 22, 2011 to file an
12 amended complaint;

13 WHEREAS, this action involves complex allegations against multiple defendants for a
14 period spanning over two years and is subject to the heightened pleading standards set forth in the
15 Private Securities Litigation Reform Act of 1995;

16 WHEREAS, in light of certain scheduling conflicts, Lead Plaintiff has requested and
17 Defendants have agreed, subject to the approval of the Court, to extend the time for Lead Plaintiff to
18 file an amended complaint by one week; and

19 WHEREAS, the parties have further agreed to the following briefing schedule for
20 Defendants’ response to the amended complaint:

21 1. Defendants shall move, answer or otherwise respond to the amended complaint
22 within 45 days after the amended complaint is filed;

23 2. In the event Defendants move to dismiss the amended complaint, Lead Plaintiff shall
24 file an opposition to Defendants’ motion to dismiss within 45 days after such motion is filed; and

25 3. In the event Defendants move to dismiss the amended complaint, Defendants shall
26 file any replies to Lead Plaintiff’s opposition to the motion to dismiss within 30 days after such
27 opposition is filed.

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1 IT IS ACCORDINGLY STIPULATED, between undersigned counsel for the parties, that
2 Lead Plaintiff shall file an amended complaint no later than April 29, 2011. Defendants shall move,
3 answer or respond to the amended complaint by June 13, 2011. In the event Defendants file a
4 motion to dismiss, Lead Plaintiff shall file an opposition to Defendants' motion to dismiss by
5 July 28, 2011; and Defendants shall file a reply in support of their motion to dismiss by August 29,
6 2011.

7 DATED: April 13, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
WILLOW E. RADCLIFFE
SARAH R. HOLLOWAY

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/s/

SARAH R. HOLLOWAY

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Lead Counsel for Plaintiffs

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DATED: April 13, 2011

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SUSAN S. MUCK
JENNIFER C. BRETAN

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/s/

JENNIFER C. BRETAN

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Attorneys for Defendants Immersion
Corporation, Victor A. Viegas, Clent Richardson,
Stephen Ambler, Richard Vogel and
Daniel Chavez

I, Sarah R. Holloway, am the ECF User whose ID and password are being used to file this
Stipulation and [Proposed] Order (i) Extending Time for Filing Lead Plaintiff's Amended Complaint
and (ii) Setting Forth a Briefing Schedule for Defendants' Motion to Dismiss. In compliance with
General Order 45, X.B., I hereby attest that Jennifer C. Bretan has concurred in this filing.

/s/
SARAH R. HOLLOWAY

* * *

ORDER

IT IS SO ORDERED.

DATED: April 14, 2011



THE HONORABLE MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE

1 CERTIFICATE OF SERVICE

2 I hereby certify that on April 13, 2011, I authorized the electronic filing of the foregoing with
3 the Clerk of the Court using the CM/ECF system which will send notification of such filing to the
4 e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I
5 caused to be mailed the foregoing document or paper via the United States Postal Service to the non-
6 CM/ECF 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 April 13, 2011.

9 /s/

10 _____
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Mailing Information for a Case 3:09-cv-04073-MMC

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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)