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 Attorneys for Defendants
 8 Frederic H. Moll, Steven M. Van Dick, Gary C.
 Restani, John G. Freund, James M. Shapiro,
 9 Christopher P. Lowe, Thomas C. McConnell, Russell
 C. Hirsch, Joseph M. Mandato, Kevin Hykes and
 10 Nominal Defendant Hansen Medical, Inc.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN FRANCISCO DIVISION
 14

15 MICHAEL BROWN, Derivatively on Behalf of
 16 HANSEN MEDICAL, INC.,

17 Plaintiff,

18 v.

19 FREDERIC H. MOLL, STEVEN M. VAN
 DICK, GARY C. RESTANI, JOHN G.
 20 FREUND, JAMES M. SHAPIRO,
 CHRISTOPHER P. LOWE, THOMAS C.
 MCCONNELL, RUSSELL C. HIRSCH,
 21 JOSEPH M. MANDATO, KEVIN HYKES,
 CHRISTOPHER SELLS, and DOES 1-25,
 22 inclusive.,

23 Defendants.

24 v.

25 HANSEN MEDICAL, INC., a Delaware
 26 corporation,

27 Nominal Defendant.
 28

No. CV 09 05881 SI

STIPULATION AND [PROPOSED]
 ORDER RE MOTION TO DISMISS
 AND EXTENDING DATE FOR CASE
 MANAGEMENT CONFERENCE

Current CMC Date: July 23, 2010
 Proposed CMC Date: November 5, 2010
 Before: Hon. Susan Illston

1 WHEREAS, in accordance with the Court’s Order Denying Motion to Stay and Granting
2 Motion to Dismiss of July 21, 2010, Plaintiff must file any amended complaint no later than
3 August 9, 2010;

4 WHEREAS, the first available hearing date for any Motion to Dismiss the amended
5 complaint on which counsel for all parties are available is November 5, 2010;

6 WHEREAS, the parties have agreed to set the hearing on Defendants’ Motion to Dismiss
7 for November 5, 2010, and have agreed to a briefing schedule for the Opposition and Reply
8 Briefs on the Motion to Dismiss;

9 WHEREAS, a Case Management Conference (“CMC”) for the above-captioned case was
10 scheduled for July 23, 2010 at 2:30 p.m.;

11 WHEREAS the parties agree that in order to avoid unnecessary legal expenses and in the
12 interests of justice and judicial economy, the CMC shall coincide with the hearing date for
13 Defendants’ Motion to Dismiss.

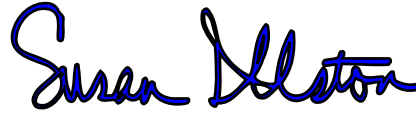
14 THEREFORE the parties, by and through their undersigned counsel of record, hereby
15 agree and stipulate to the following:

- 16 1. Defendants shall file any Motion to Dismiss on or before September 8, 2010;
- 17 2. Plaintiff shall file any Opposition to Defendants’ Motion to Dismiss on or before
18 October 8, 2010;
- 19 3. Defendants shall file any Reply on or before October 25, 2010;
- 20 4. The hearing on Defendants’ Motion to Dismiss shall be set for November 5, 2010
21 at 9:00 a.m. or as soon thereafter as the matter may be heard;
- 22 5. The CMC shall be continued to November 5, 2010 at 9:00 a.m., or as soon as
23 available thereafter, to correspond with the hearing on Defendants’ Motion to Dismiss. The
24 deadlines for associated pre-conference filings, including the Case Management Statement, Rule
25 26(f) Report and Initial Disclosures, set forth in the Court’s Order Setting Initial Case
26 Management Conference and ADR Deadlines, shall be continued accordingly.

[PROPOSED] ORDER

Based on the above stipulation of the Parties and for good cause appearing therefore, IT
IS SO ORDERED.

DATED: _____, 2010



Hon. Susan Illston
United States District Judge

The cmc will be set at 2:30 p.m. and the motion will be set at 9:00 a.m. on
11/5/10.

