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11 Lead Counsel for Plaintiff

12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA

14 DAVID SMITH, Individually and on Behalf of)
 15 All Others Similarly Situated,)

16 Plaintiff,)

17 vs.)

18 TELENNAV, INC., et al.,)

19 Defendants.)
 20

No. 10-cv-03942-SC

CLASS ACTION

) STIPULATION AND [~~PROPOSED~~] ORDER
) CHANGING TIME FOR FILING LEAD
) PLAINTIFF'S AMENDED COMPLAINT,
) SETTING BRIEFING SCHEDULE ON
) MOTION TO DISMISS AND CONTINUING
) CASE MANAGEMENT CONFERENCE
) [AMENDED]

1 WHEREAS, Plaintiff David Smith filed a complaint against defendants TeleNav, Inc., H.P.
2 Jin, Douglas S. Miller, Shawn Carolan, Samuel Chen, Hon Jane Chiu, Soo Boon Koh, Joseph M.
3 Zaelit, J.P. Morgan Securities Inc., and Deutsche Bank Securities Inc. on September 2, 2010 (Dkt.
4 No. 1);

5 WHEREAS, on October 5, 2010, the Court entered an order extending time to respond to the
6 complaint and continuing the case management conference to June 10, 2011 (Dkt. No. 6);

7 WHEREAS, on November 1, 2010, plaintiff moved for appointment as lead plaintiff and the
8 appointment of Robbins Geller Rudman & Dowd, LLP as lead counsel (Dkt. No. 11);

9 WHEREAS, on February 3, 2011, the Court granted plaintiff's motion for appointment as
10 lead plaintiff and selection of lead counsel (Dkt. No. 16);

11 WHEREAS, the parties met and conferred and agreed, subject to the Court's approval, to the
12 following briefing schedule:

- 13 1. Plaintiff's amended complaint shall be filed no later than March 21, 2011;
- 14 2. Defendants' motion to dismiss shall be filed no later than May 5, 2011;
- 15 3. Plaintiff's opposition to defendants' motion shall be filed no later than June 20, 2011;
- 16 4. Defendants' reply shall be filed no later than July 11, 2011;

17 WHEREAS, the parties request that the Court set a hearing on the motion to dismiss for July
18 29, 2011 or on a date thereafter which is convenient for the Court;

19 WHEREAS, the parties request that the Court continue the case management conference,
20 currently set for June 10, 2011, to the same date as the hearing on defendants' motion to dismiss.

21 NOW THEREFORE, it is stipulated and agreed:

- 22 1. Plaintiff shall file an amended complaint no later than March 21, 2011;
- 23 2. Defendants shall file their motion to dismiss no later than May 5, 2011;
- 24 3. Plaintiff shall file its opposition to defendants' motion no later than June 20, 2011;
- 25 4. Defendants shall file their reply no later than July 11, 2011;
- 26 5. A hearing on defendants' motion to dismiss shall be set for July 29, 2011, or a date
27 thereafter convenient for the Court;

28

1 6. The case management conference currently set for June 10, 2011, shall be continued
2 to July 29, 2011 or to the same date as the hearing on defendants' motion to dismiss.

3 The parties respectfully request that the Court enter an Order approving this Stipulation.

4 DATED: February 14, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
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Lead Counsel for Plaintiff

17 DATED: February 14, 2011

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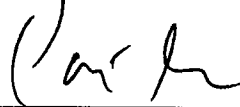
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Counsel for Defendants J.P. Morgan Securities
Inc. and Deutsche Bank Securities Inc.

* * *

ORDER

The hearing on Motion to Dismiss shall be heard on August 12, 2011 @ 10:00 a.m.

The Case Management Conference shall be continued to September 9, 2011 @ 10:00 a.m.

IT IS SO ORDERED.

DATED: 2/15/11

THE NORTHERN DISTRICT OF CALIFORNIA
UNITED STATES DISTRICT COURT
IT IS SO ORDERED
Judge Samuel Conti
JUDGE

1 CERTIFICATE OF SERVICE

2 I hereby certify that on February 15, 2011, I authorized the electronic filing of the foregoing
3 with the Clerk of the Court using the CM/ECF system which will send notification of such filing to
4 the 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 February 15, 2011.

9 s/ Daniel J. Pfefferbaum
10 DANIEL J. PFEFFERBAUM

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Mailing Information for a Case 3:10-cv-03942-SC

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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)