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10 Lead Counsel for Plaintiff

11 [Additional counsel appear on signature page.]

12 UNITED STATES DISTRICT COURT
 13
 14 NORTHERN DISTRICT OF CALIFORNIA

15 DAVID SMITH, Individually and on Behalf of)	No. 10-cv-03942-SC
All Others Similarly Situated,)
)
16 Plaintiff,)
)
17 vs.)
)
18 TELENV, INC., et al.,)
)
19 Defendants.)
)
20)

CLASS ACTION
 STIPULATION AND [~~PROPOSED~~] ORDER
 REGARDING SETTLEMENT AND
 STAYING FURTHER PROCEEDINGS

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

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

7 WHEREAS, on February 3, 2011, the Court granted Plaintiff’s motion for appointment as
8 lead plaintiff and selection of lead counsel (Dkt. No. 16);

9 WHEREAS, on February 15, 2011, by stipulation, the Court set a briefing schedule for
10 Plaintiff’s amended complaint and Defendants’ motion to dismiss, and set a hearing date of August
11 12, 2011 for Defendants’ motion to dismiss and a case management conference for September 9,
12 2011 (Dkt. No. 19);

13 WHEREAS, on March 21, 2011, Plaintiff filed his Amended Complaint for Violation of the
14 Federal Securities Laws (“Amended Complaint”) (Dkt. No. 20);

15 WHEREAS, on May 4 and 5, 2011, Defendants filed their Notice of Motion and Motion to
16 Dismiss Plaintiff’s Amended Complaint (“Motion to Dismiss”) (Dkt. Nos. 21-24);

17 WHEREAS, on May 18, 2011, the parties attended a mediation session with the Hon. Layn
18 R. Phillips (Ret.);

19 WHEREAS, through continued dialogue facilitated by Judge Phillips, on May 31, 2011, the
20 parties reached an agreement in principle to resolve this action;

21 WHEREAS, counsel for Plaintiff and counsel for Defendants are currently working together
22 on a Stipulation of Settlement to be submitted to the Court with a motion for preliminary approval of
23 settlement no later than July 15, 2011;

24 WHEREAS, in light of the agreement reached, the parties request that the Court vacate the
25 August 12, 2011 hearing date and the September 9, 2011 case management conference and stay all
26 further proceedings.

27 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
28 undersigned, subject to Court approval, as follows:

1 1. The hearing on Defendants' Motion to Dismiss, scheduled for August 12, 2011, shall
2 be vacated.

3 2. The case management conference scheduled for September 9, 2011 shall be vacated.

4 3. Counsel for Plaintiff and counsel for Defendants shall submit a Stipulation of
5 Settlement and a motion for preliminary approval of settlement to the Court no later than July 15,
6 2011.

7 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

8 DATED: June 1, 2011

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& DOWD LLP
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25 Additional Counsel for Plaintiff

26
27
28

1 DATED: June 1, 2011

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& ROSATI, P.C.
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12 Counsel for Defendants Telenav, Inc., H.P. Jin,
13 Douglas S. Miller, Shawn Carolan, Samuel Chen,
14 Hon Jane Chiu, Soo Boo Koh and Joseph M.
15 Zaelit

13 DATED: June 1, 2011

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15 s/ Patrick E. Gibbs
16 PATRICK E. GIBBS

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

22 I, Daniel J. Pfefferbaum, am the ECF User whose ID and password are being used to file this
23 Stipulation and [Proposed] Order Regarding Settlement and Staying Further Proceedings. In
24 compliance with General Order No. 45, X.B., I hereby attest that Boris Feldman and Patrick E.
25 Gibbs have concurred in this filing.

26 s/ Daniel J. Pfefferbaum
27 DANIEL J. PFEFFERBAUM

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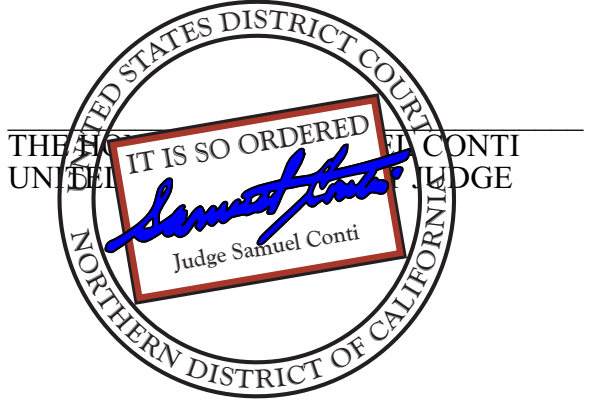
ORDER

1. The hearing on Defendants’ Motion to Dismiss, scheduled for August 12, 2011, is vacated.

~~2. The case management conference scheduled for September 9, 2011 is vacated. SC~~

3. Counsel for Plaintiff and counsel for Defendants shall submit a Stipulation of Settlement and a motion for preliminary approval of settlement to the Court no later than July 15, 2011.

DATED: June 2, 2011



1 CERTIFICATE OF SERVICE

2 I hereby certify that on June 1, 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 June 1, 2011.

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

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

Electronic Mail Notice List

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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)