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8 Attorneys for Defendant Juniper Networks, Inc.  
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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 WARREN AVERY, Individually and on Behalf )  
of All Others Similarly Situated, )  
13 Plaintiff, )  
14 v. )  
15 JUNIPER NETWORKS, INC., KEVIN R. )  
JOHNSON, PRADEEP S. SINDHU, ROBYN M. )  
16 DENHOLM and GENE ZAMISKA, )  
17 Defendants. )

CASE NO: 13-CV-3733 WHO  
**STIPULATION AND ORDER  
EXTENDING TIME TO RESPOND  
TO COMPLAINT, SETTING  
BRIEFING SCHEDULE, AND  
CONTINUING CASE  
MANAGEMENT CONFERENCE**

1 Plaintiff Warren Avery (“Plaintiff”), by and through his undersigned counsel, and  
2 defendant Juniper Networks, Inc. (“Juniper”), by and through its undersigned counsel, hereby  
3 stipulate and agree as follows:

4 WHEREAS, on August 12, 2013, Plaintiff commenced this action by filing the Complaint  
5 for Violations of the Federal Securities Laws (“Complaint”);

6 WHEREAS, on October 11, 2013, Plaintiff filed a motion for appointment as lead plaintiff  
7 pursuant to the Private Securities Litigation Act, and no other shareholder has filed a motion  
8 seeking appointment as lead plaintiff;

9 WHEREAS, the parties have met and conferred, and agreed to a schedule for defendants’  
10 anticipated motion(s) to dismiss and other matters;

11 NOW THEREFORE, the parties, through their undersigned counsel, hereby stipulate and  
12 agree, and request the Court to enter an order, as follows:

13 1. In the event the Court enters an order appointing Plaintiff as lead plaintiff, Plaintiff  
14 shall have forty-five (45) days from the date of such order within which to file an amended  
15 complaint;

16 2. All defendants named in the Complaint need not file an answer or otherwise  
17 respond to the Complaint, and instead, all defendants shall file their motion(s) to dismiss (or  
18 answer or otherwise respond) to Plaintiff’s anticipated amended complaint within forty-five (45)  
19 days of the filing of said amended complaint;

20 3. Plaintiff shall file his opposition brief(s) to defendants’ motion(s) to dismiss within  
21 forty-five (45) days after the motion(s) to dismiss are filed;

22 4. Defendants shall file their reply brief(s) within thirty (30) days after Plaintiff’s  
23 opposition brief(s) is/are filed;

24 5. The dates December 21, 2013 to January 1, 2014, inclusive, shall not be counted  
25 when calculating the above-stated time frames for acting, such that no party whose time frame for  
26 acting shall include any of those days;

27 6. Counsel for the parties shall meet and confer promptly after the Court enters an  
28 order appointing a lead plaintiff, to be sure all parties agree regarding the specific dates on which

1 the deadlines fall (given the foregoing provision to accommodate the holidays), and to select a  
2 mutually agreeable hearing date;

3 7. The Case Management Conference currently scheduled for November 12, 2013, at  
4 2:00 PM shall be continued to a date at the Court's convenience following the decision on  
5 defendants' anticipated motion(s) to dismiss; and

6 8. Nothing in this stipulation shall affect in any way any possible defenses that  
7 defendants may assert in responding to the Complaint.

8 **SO STIPULATED.**

9 Dated: October 29, 2013

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

11 By: s/ Joni Ostler  
12 Joni Ostler

13 *Attorneys for Defendant Juniper Networks, Inc.*

14 *I, Joni Ostler, am the ECF user whose ID and password are being used to file this*  
15 *Stipulation and [Proposed] Order Extending Time to Respond to Complaint, Setting Briefing*  
16 *Schedule, and Continuing Case Management Conference. In compliance with Civil Local Rule*  
*5-1(i)(3), I attest that Jeremy A. Lieberman and Robert V. Prongay have concurred in this filing.*

17 Dated: October 29, 2013

POMERANTZ GROSSMAN HUFFORD  
DAHLSTROM & GROSS LLP

19 By: s/ Jeremy A. Lieberman  
20 Jeremy A. Lieberman

21 *Attorneys for Plaintiff and Lead Plaintiff*  
*Movant Warren Avery*

22 Dated: October 29, 2013

GLANCY BINKOW & GOLDBERG LLP

24 By: s/ Robert V. Prongay  
25 Robert V. Prongay

26 *Attorneys for Plaintiff and Lead Plaintiff*  
27 *Movant Warren Avery*


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**ORDER**

Pursuant to Stipulation, **modified as follows**, it is SO ORDERED:

The rescheduled Case Management Conference is set for May 13, 2014 at 2 p.m. The parties shall file a Joint Case Management Statement on or before May 6, 2014.

Dated: October 30, 2013

  
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THE HONORABLE WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE