

1 BORIS FELDMAN, State Bar No. 128838  
 GIDEON A. SCHOR, State Bar of New York  
 2 (admitted *pro hac vice*)  
 AARON J. BENJAMIN, State Bar No. 301796  
 3 WILSON SONSINI GOODRICH & ROSATI  
 Professional Corporation  
 4 650 Page Mill Road  
 Palo Alto, CA 94304-1050  
 5 Telephone: (650) 493-9300  
 Facsimile: (650) 493-6811  
 6 boris.feldman@wsgr.com  
 gschor@wsgr.com  
 7 abenjamin@wsgr.com

8 Attorneys for Defendants Brocade  
 Communications Systems, Inc., Judy Bruner,  
 9 Lloyd A. Carney, Renato A. DiPentima,  
 Alan L. Earhart, John W. Gerdelman,  
 10 Kim C. Goodman, David L. House,  
 L. William Krause, David E. Roberson,  
 11 and Sanjay Vaswani

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14

15 BOBBY M. MATHEW, Individually and on )  
 Behalf of All Others Similarly Situated, )  
 16 )  
 Plaintiff, )  
 17 )  
 vs. )  
 18 )  
 19 BROCADE COMMUNICATIONS SYSTEMS, )  
 INC., BROADCOM LIMITED, BROADCOM )  
 20 CORPORATION, DAVID L. HOUSE, LLOYD )  
 A. CARNEY, JUDY BRUNER, RENATO A. )  
 21 DiPENTIMA, ALAN L. EARHART, JOHN W. )  
 GERDELMAN, KIM C. GOODMAN, L. )  
 22 WILLIAM KRAUSE, DAVID E. ROBERSON )  
 and SANJAY VASWANI, )  
 23 )  
 Defendants. )  
 24 )  
 25 )  
 26 )  
 27 )  
 28 )

CASE NO.: 3:17-CV-00237-EMC  
 STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING TIME TO  
 RESPOND TO COMPLAINT  
 Before: Hon. Edward Milton Chen  
 Complaint Filed: January 18, 2017

STIP. & [PROPOSED] ORDER EXTENDING TIME TO  
 RESPOND  
 CASE NO. 3:17-CV-00237-EMC

1           WHEREAS, Plaintiff Bobby M. Mathew (“Plaintiff”) filed his Complaint for Violation  
2 of the Federal Securities Laws on January 18, 2017 (“Complaint”) against Brocade  
3 Communications Systems, Inc., David L. House, Lloyd A. Carney, Judy Bruner, Renato A.  
4 DiPentima, Alan L. Earhart, John W. Gerdelman, Kim C. Goodman, L. William Krause, David  
5 E. Roberson and Sanjay Vaswani (collectively, “Brocade Defendants”), Broadcom Limited, and  
6 Broadcom Corporation;

7           WHEREAS, Brocade Defendants waived service of the Complaint, and their responses to  
8 the Complaint are currently due April 3, 2017;

9           WHEREAS, the Court has ordered this case related to five other cases currently pending  
10 in the Northern District of California, entitled *Steinberg v. Brocade Communications Systems,*  
11 *Inc., et al.*, Case No. 3:16-cv-07081-EMC, *Gross v. Brocade Communications Systems, Inc., et*  
12 *al.*, Case No. 3:16-cv-07173-EMC, *Jha v. Brocade Communications Systems, Inc., et al.*, Case  
13 No. 3:16-cv-07270-EMC, *Bragan v. Brocade Communications Systems, Inc., et al.*, Case No.  
14 4:16-cv-07271-EMC, and *Chuakay v. Brocade Communications Systems, Inc.*, et al., Case No.  
15 3:17-cv-00058-EMC;

16           WHEREAS, counsel for Plaintiff and counsel for Brocade Defendants have stipulated  
17 that Brocade Defendants need not answer the Complaint and shall meet and confer on a schedule  
18 after consolidation of this case and the above-referenced cases and after the appointment of a  
19 lead plaintiff and lead counsel pursuant to the Private Securities Litigation Reform Act of 1995  
20 and the lead plaintiff’s filing of a consolidated amended complaint;

21           NOW, THEREFORE, the parties, by and through their respective counsel, stipulate and  
22 agree as follows:

23           1.       Brocade Defendants shall not be required to, and shall not waive any rights,  
24 arguments, or defenses by waiting to, answer, move, or otherwise respond to the Complaint in this  
25 action;

26           2.       Brocade Defendants and Plaintiff shall meet and confer on a schedule after  
27 consolidation and after the appointment of a lead plaintiff and lead counsel pursuant to the Private  
28

1 Securities Litigation Reform Act of 1995 and the lead plaintiff's filing of a consolidated amended  
2 complaint;

3 3. Nothing in this Stipulation shall be construed as a waiver of any of Brocade  
4 Defendants' rights or positions in law or in equity, or as a waiver of any defenses that the Brocade  
5 Defendants would otherwise have, including, without limitation, jurisdictional defenses.

6 IT IS SO STIPULATED.

7 Dated: February 16, 2017

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation  
BORIS FELDMAN

8  
9 By: /s/ Boris Feldman  
10 Boris Feldman

11 650 Page Mill Road  
12 Palo Alto, CA 94304  
13 Telephone: (650) 493-9300  
14 Facsimile: (650) 493-6811  
15 boris.feldman@wsgr.com

16 Attorneys for Defendants Brocade  
17 Communications Systems, Inc., Judy Bruner,  
18 Lloyd A. Carney, Renato A. DiPentima,  
19 Alan L. Earhart, John W. Gerdelman, Kim C.  
20 Goodman, David L. House, L. William Krause,  
21 David E. Roberson, and Sanjay Vaswani

18 Dated: February 16, 2017

ROBBINS GELLER RUDMAN & DOWD LLP  
DAVID T. WISSBROECKER

19 By: /s/ David T. Wissbroecker  
20 David T. Wissbroecker

21 655 W Broadway  
22 Suite 1900  
23 San Diego, CA 92101  
24 Facsimile: (619) 231-7423  
25 Email: dwissbroecker@rgrdlaw.com

26 Attorneys for Plaintiff  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

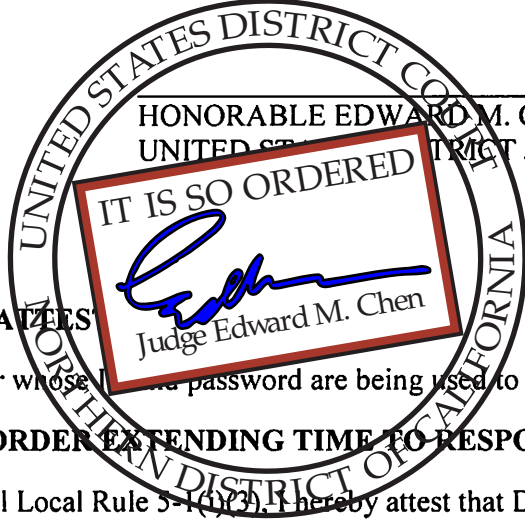
**[PROPOSED] ORDER**

**GOOD CAUSE HAVING BEEN SHOWN**, it is hereby ordered that:

- 1. Brocade Defendants will not be required to, and shall not waive any rights, arguments, or defenses by waiting to, answer, move, or otherwise respond to the Complaint in this action;
- 2. Brocade Defendants and Plaintiff shall meet and confer on a schedule after consolidation and after the appointment of a lead plaintiff and lead counsel pursuant to the Private Securities Litigation Reform Act of 1995 and the lead plaintiff's filing of a consolidated amended complaint;
- 3. Nothing in this Stipulation shall be construed as a waiver of any of Brocade Defendants' rights or positions in law or in equity, or as a waiver of any defenses that Brocade Defendants would otherwise have, including, without limitation, jurisdictional defenses.

**IT IS SO ORDERED.**

DATED: 2/21/17



HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE

ATTEST

I, Boris Feldman, am the ECF user whose [redacted] password are being used to file this **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO COMPLAINT**. In compliance with Civil Local Rule 5-1(c)(3), I hereby attest that David T. Wissbroecker has concurred in this filing.

Dated: February 16, 2017

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Boris Feldman  
Boris Feldman