

1 CHRISTOPHER H. McGRATH (SB# 149129)
 chrismcgrath@paulhastings.com
 2 KIMBERLEY A. DONOHUE (SB# 247027)
 kimberleydonohue@paulhastings.com
 3 PAUL, HASTINGS, JANOFSKY & WALKER LLP
 4747 Executive Drive, 12th Floor
 4 San Diego, CA 921210
 Telephone: (858) 458-3000
 5 Facsimile: (858) 458-3005

6 THOMAS A. ZACCARO (SB# 183241)
 thomaszaccaro@paulhastings.com
 7 PAUL, HASTINGS, JANOFSKY & WALKER LLP
 515 South Flower Street, 25th Floor
 8 Los Angeles, CA 90074-2228
 Telephone: (213) 683-6000
 9 Facsimile: (213) 627-0705

10 EDWARD HAN (SB# 196924)
 edwardhan@paulhastings.com
 11 PAUL, HASTINGS, JANOFSKY & WALKER LLP
 55 Second Street, 24th Floor
 12 San Francisco, CA 94105
 Telephone: (415) 856-7000
 13 Facsimile: (415) 856-7100

14 *Attorneys for Nominal Defendant VeriSign, Inc.*

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

19 In re VERISIGN, INC. DERIVATIVE
 LITIGATION

MASTER FILE NO. C-06-4165-PJH

21 This Document Relates To:

**STIPULATION AND [~~PROPOSED~~]
 ORDER RESCHEDULING CASE
 MANAGEMENT CONFERENCE**

22 ALL ACTIONS.

23 Judge: Hon. Phyllis J. Hamilton
 24 Ctrm: 3, 17th Floor

1 The parties, by their undersigned counsel, hereby stipulate to the following:

2 WHEREAS, on September 14, 2007, the Court granted the motion by KPMG LLP to
3 compel arbitration of the claims against it and granted the other defendants' respective motions to
4 dismiss in the above-captioned matter;

5 WHEREAS, on October 12, 2007, the Court granted the plaintiffs' administrative motion
6 to enlarge the time to file the second amended complaint, and ordered that the second amended
7 complaint be filed by November 16, 2007 with defendants' responses filed by December 18,
8 2007;

9 WHEREAS, the plaintiffs filed the Verified Second Amended Shareholder Derivative
10 Complaint on November 16, 2007 ("SAC");

11 WHEREAS, on May 13, 2008, the Court granted the parties' stipulation to (1) set a
12 schedule for the filing of defendants' responses to the SAC, and (2) schedule a case management
13 conference on June 19, 2008 to discuss the progress of settlement negotiations;

14 WHEREAS, on June 11, 2008, the Court granted the parties' stipulation to reschedule the
15 case management conference to July 24, 2008;

16 WHEREAS, there is a related state court consolidated putative class action entitled *In re*
17 *VeriSign, Inc. Options Litigation*, Master Case No. 1-07-CV-085890, pending in the California
18 State Superior Court, Santa Clara County ("Parallel State Court Class Action"), before the
19 Honorable Jack Komar, with many of the same named defendants and similar underlying
20 allegations;

21 WHEREAS, due to the state court's continuance of the hearing on defendants' motions to
22 dismiss (demurrers) in the Parallel State Court Class Action, the Court granted the parties'
23 stipulation to reschedule the case management conference to August 28, 2008;

24 WHEREAS, a hearing on the defendants' motions to dismiss (demurrers) the Parallel
25 State Court Class Action complaint was held on August 1, 2008, at which time Judge Komar
26 granted defendants' motions to dismiss (demurrers) and granted plaintiff leave to amend the
27 complaint;

28

1 WHEREAS, the parties filed a Joint Case Management Statement on August 21, 2008,
2 after which the Court took the August 28, 2008 case management conference off calendar and
3 rescheduled it to December 4, 2008;

4 WHEREAS, the parties in this action and the Parallel State Court Class Action met in
5 Washington, D.C., on October 1, 2008 for the purpose of engaging in settlement discussions;

6 WHEREAS, the parties have and continue to engage in those settlement discussions,
7 which are complicated due to the pendency of related state court litigation, and believe that
8 additional time is necessary for the parties to further pursue that discussion; and

9 WHEREAS, the parties believe the case management conference currently scheduled for
10 December 4, 2008 should be rescheduled to a later date to provide an opportunity for the parties
11 to continue their settlement discussion.

12 NOW, THEREFORE, the parties hereby stipulate to the following:

13 The currently scheduled case management conference on December 4, 2008 to discuss the
14 progress of settlement negotiations between the parties will be rescheduled to February 5, 2009 at
15 2:30 p.m. or as soon thereafter as is convenient for the Court.

16
17 DATED: November 24, 2008

PAUL, HASTINGS, JANOFSKY & WALKER LLP

18
19 By: /s/Christopher H. McGrath
CHRISTOPHER H. McGRATH

20 *Attorneys for Nominal Defendant VeriSign, Inc.*

21
22 DATED: November 24, 2008

AKIN, GUMP, STRAUSS, HAUER & FELD LLP


23
24 By: 
STEVEN S. KAUFHOLD

25 *Attorneys for Defendants Stratton D. Sclavos, Dana L.*
26 *Evan, and Gregory L. Reyes*

1 DATED: November 24, 2008

COOLEY GODWARD KRONISH LLP

2

By: 
KOJI F. FUKUMURA

3

4

Attorneys for Defendants Kevin Compton, Quentin Gallivan, Michelle Guthrie, Diana S. Keith, Robert J. Korzeniewski, F. Terry Kremian, Scott G. Kriens, Roger H. Moore, Edward A. Mueller, Anil H.P. Pereira, William A. Roper, Jr., Arnold Schaeffer, Louis A. Simpson, and Richard A. Yanowitch

5

6

7

8 DATED: November 24, 2008

ORRICK, HERRINGTON & SUTCLIFFE LLP

9

By: 
MELINDA HAAG

10

11

Attorneys for Defendants D. James Bidzos, William L. Chenevich, David J. Cowan, Len J. Lauer, and Timothy Tomlinson

12

13 DATED: November 24, 2008

BINGHAM McCUTCHEN LLP

14

By: 
DALE E. BARNES

15


16

Attorneys for Defendant KPMG LLP

17 DATED: November 24, 2008

BARRACK, RODOS & BACINE

18

By: 
STEPHEN R. BASSER

19

20

Attorneys for Plaintiffs

21 DATED: November 24, 2008

WOLF HALDENSTEIN ADLER FREEMAN
& HERZ, LLP

22

By: 
RACHELE R. RICKERT

23

24

Attorneys for Plaintiffs

25

26

27

28

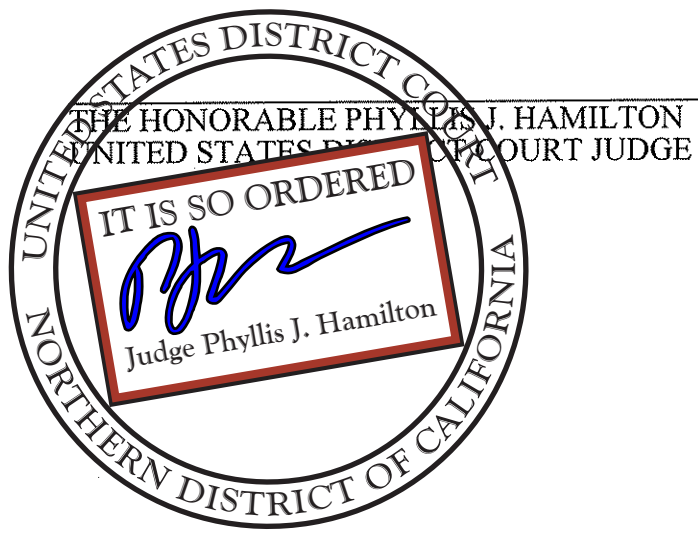
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

* * *

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 11/24/08



LEGAL_US_W # 60414826.1