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14 *Attorneys for Nominal Defendant VeriSign, Inc.*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION
18

19 In re VERISIGN, INC. DERIVATIVE
20 LITIGATION

MASTER FILE NO. C-06-4165-PJH

21 This Document Relates To:

22 ALL ACTIONS.

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

24 Judge: Hon. Phyllis J. Hamilton
25 Ctrm: 3, 17th Floor
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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, on November 24, 2008, the Court granted the parties' stipulation to continue
7 the December 4, 2008 case management conference to February 5, 2009;

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

11 WHEREAS, the parties believe the case management conference currently scheduled for
12 February 5, 2009 should be rescheduled to a later date to provide an opportunity for the parties to
13 continue their settlement discussion.

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

15 The currently scheduled case management conference on February 5, 2009 to discuss the
16 progress of settlement negotiations between the parties will be rescheduled to June 11, 2009 at
17 2:30 p.m. or as soon thereafter as is convenient for the Court.

18
19 DATED: January 29, 2009

PAUL, HASTINGS, JANOFSKY & WALKER LLP

21 By: /s/Christopher H. McGrath
22 CHRISTOPHER H. McGRATH

23 *Attorneys for Nominal Defendant VeriSign, Inc.*
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28

1 DATED: January 29, 2009

AKIN, GUMP, STRAUSS, HAUER & FELD LLP

2
3 By:


STEVEN S. KAUFHOLD

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

6 DATED: January 29, 2009

COOLEY GODWARD KRONISH LLP

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8 By:


KOJI F. FUKUMURA

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11
12 DATED: January 29, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP

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14 By:

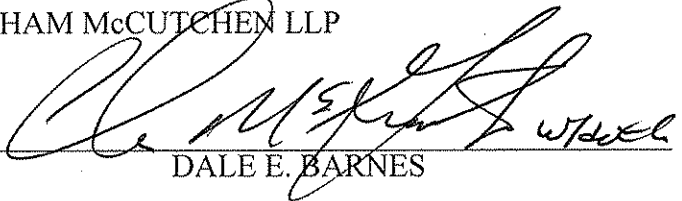

MELINDA HAAG

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

17
18 DATED: January 29, 2009

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21 *Attorneys for Defendant KPMG LLP*

22 DATED: January 29, 2009

BARRACK, RODOS & BACINE

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24 By:


STEPHEN R. BASSIER

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26 *Attorneys for Plaintiffs*

1 DATED: January 29, 2009

WOLF HALDENSTEIN ADLER FREEMAN
& HERZ, LLP

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3 By:


RACHELE R. RICKERT

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5 Attorneys for Plaintiffs

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9 **ORDER**

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11 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

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13 DATED: 1/30/09

14 THE HONORABLE PHYLLIS J. HAMILTON
UNITED STATES DISTRICT COURT JUDGE

