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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

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: 5, 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, there is a related state court derivative action entitled *Port Authority of*  
22 *Allegheny County Retirement & Disability Allowance Plan v. Bidzos et al.*, Case No. 1-06-CV-  
23 069192, pending in the California State Superior Court, Santa Clara Count ("State Court  
24 Derivative Action"), before the Honorable Jack Komar, which has been stayed pending the  
25 outcome of this action;

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

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

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

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

10           WHEREAS, on November 24, 2008, the Court granted the parties' stipulation to continue  
11 the December 4, 2008 case management conference to February 5, 2009;

12           WHEREAS the parties to the Parallel State Court Class Action, the State Court Derivative  
13 Action and this action met in Washington, D.C., on October 1, 2008 for the purpose of engaging  
14 in settlement discussions, and those settlement discussions have been ongoing since that date,  
15 including settlement discussions held on February 25, 2009;

16           WHEREAS the parties have reached a collective settlement in principle of this action and  
17 the related actions, have exchanged a draft stipulation of settlement, and are in the process of  
18 drafting the papers outlining the terms of that settlement;

19           WHEREAS, the parties believe that additional time is necessary for the parties to finalize  
20 the terms of the stipulation of settlement; and

21           WHEREAS, the parties believe the case management conference currently scheduled for  
22 June 11, 2009 should be rescheduled to a later date to provide an opportunity for the parties to  
23 continue their settlement discussion.

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

25           The currently scheduled case management conference on June 11, 2009 to discuss the  
26 progress of settlement negotiations between the parties will be rescheduled to July 30, 2009 at  
27 2:30 p.m. or as soon thereafter as is convenient for the Court.  
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DATED: June 4, 2009

PAUL, HASTINGS, JANOFSKY & WALKER LLP

By: /s/ Kimberley A. Donohue  
KIMBERLEY A. DONOHUE

*Attorneys for Nominal Defendant VeriSign, Inc.*

DATED: June 4, 2009

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DATED: June 4, 2009

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DATED: June 4, 2009

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DATED: June 4, 2009

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DATED: June 4, 2009

BARRACK, RODOS & BACINE

By: Kimberley A. Donohue with permission  
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DATED: June 4, 2009

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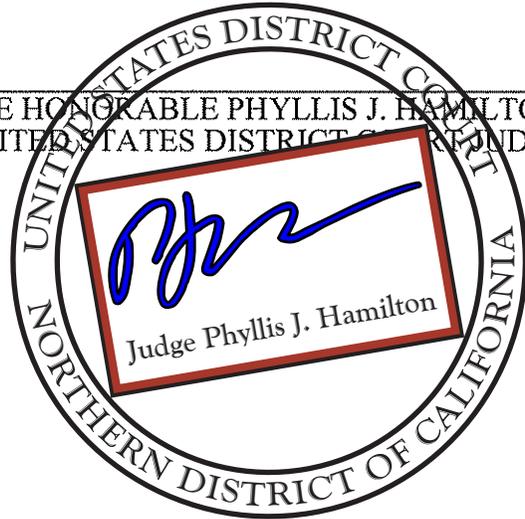
\* \* \*

**ORDER**

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED: 06/11/09

\_\_\_\_\_  
THE HONORABLE PHYLLIS J. HAMILTON  
UNITED STATES DISTRICT COURT JUDGE



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