

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  
 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;

WHEREAS, a hearing on the defendants' motions to dismiss (demurrers) the Parallel

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

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

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

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

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

15 WHEREAS the Court has granted the parties' stipulations to continue the case  
16 management conferences in light of these settlement negotiations, most recently scheduling a case  
17 management conference for September 3, 2009;

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

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

23 WHEREAS, the parties believe the case management conference currently scheduled for  
24 September 3, 2009 should be rescheduled to a later date to provide an opportunity for the parties  
25 to continue their settlement discussion and for finalization of settlement documents.

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

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

The currently scheduled case management conference on September 3, 2009 to discuss the progress of settlement negotiations between the parties will be rescheduled to November 19, 2009 at 2:30 p.m. or as soon thereafter as is convenient for the Court.

DATED: August 27, 2009

PAUL, HASTINGS, JANOFSKY & WALKER LLP

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

*Attorneys for Nominal Defendant VeriSign, Inc.*

DATED: August 27, 2009

AKIN, GUMP, STRAUSS, HAUER & FELD LLP

By: /s/ Steven S. Kaufhold  
STEVEN S. KAUFHOLD

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

DATED: August 27, 2009

COOLEY GODWARD KRONISH LLP

By: /s/ Koji F. Fukumura  
KOJI F. FUKUMURA

*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*

DATED: August 27, 2009

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: /s/ Melinda Haag  
MELINDA HAAG

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

1 DATED: August 27, 2009

BINGHAM McCUTCHEN LLP

2  
3 By: /s/ Dale E. Barnes  
DALE E. BARNES

4 *Attorneys for Defendant KPMG LLP*

5 DATED: August 27, 2009

BARRACK, RODOS & BACINE

6  
7 By: /s/ Stephen R. Basser  
STEPHEN R. BASSER

8 *Attorneys for Plaintiffs*

9 DATED: August 27, 2009

10 WOLF HALDENSTEIN ADLER FREEMAN  
& HERZ, LLP

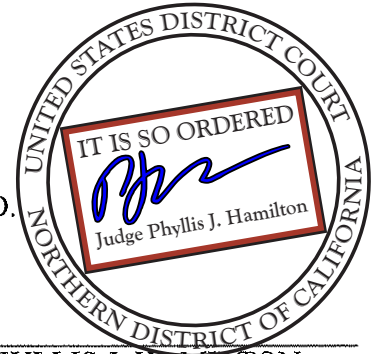
11  
12 By: /s/ Francis M. Gregorek  
FRANCIS M. GREGOREK

13 *Attorneys for Plaintiffs*

14  
15  
16 \* \* \*

17 **ORDER**

18  
19 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.



20  
21 DATED: August 28, 2009

22 THE HONORABLE PHYLLIS J. HAMILTON  
23 UNITED STATES DISTRICT COURT JUDGE