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14 *Attorneys for Nominal Defendant VeriSign, Inc.*

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 OAKLAND DIVISION

19 In re VERISIGN, INC. DERIVATIVE  
 LITIGATION

MASTER FILE NO. 4:06-cv-04165-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, 3rd 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 Court has granted the parties' stipulations to continue the case  
17 management conferences in light of these settlement negotiations, most recently scheduling a case  
18 management conference for November 19, 2009;

19           WHEREAS the parties have reached a collective settlement in principle of this action and  
20 the related actions, have exchanged drafts of the stipulation of settlement, are in the process of  
21 drafting the papers outlining the terms of that settlement, and are awaiting VeriSign's Board of  
22 Directors' review of that settlement;

23           WHEREAS the parties believe that additional time is necessary for the parties to finalize  
24 the terms of the stipulation of settlement; and

25           WHEREAS the parties believe the case management conference currently scheduled for  
26 November 19, 2009 should be rescheduled to a later date to provide an opportunity for the parties  
27 to continue their settlement discussion and for finalization of settlement documents.

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

2 The currently scheduled case management conference on November 19, 2009 to discuss  
3 the progress of settlement negotiations between the parties will be rescheduled to December 17,  
4 2009 at ~~2:30~~ 2:00 p.m. or as soon thereafter as is convenient for the Court.

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6 DATED: November 13, 2009 PAUL, HASTINGS, JANOFSKY & WALKER LLP

7  
8 By: /s/ Kimberley A. Donohue  
9 KIMBERLEY A. DONOHUE

10 *Attorneys for Nominal Defendant VeriSign, Inc.*

11 DATED: November 13, 2009 AKIN, GUMP, STRAUSS, HAUER & FELD LLP

12  
13 By: /s/ Steven S. Kaufhold  
14 STEVEN S. KAUFHOLD

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

16 DATED: November 13, 2009 COOLEY GODWARD KRONISH LLP

17  
18 By: /s/ Koji F. Fukumura  
19 KOJI F. FUKUMURA

20 *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*

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22  
23 DATED: November 13, 2009 ORRICK, HERRINGTON & SUTCLIFFE LLP

24  
25 By: /s/ Melinda Haag  
26 MELINDA HAAG

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

