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8 *Attorneys for Defendant Juniper Networks, Inc.*  
 9 *and Non-Party Witnesses Jodi Sutton, Ann Laporte*  
 10 *and Ray Martinelli*

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN JOSE DIVISION

14 In re JUNIPER NETWORKS, INC. )  
 15 SECURITIES LITIGATION )

CASE NO.: C06-04327-JW

16 \_\_\_\_\_ )  
 17 This Document Relates To: )

18 ALL ACTIONS )  
 19 \_\_\_\_\_ )

**STIPULATION AND**  
~~**[PROPOSED]**~~ **ORDER**  
**SHORTENING TIME FOR**  
**HEARING THE MOTION FOR**  
**PROTECTIVE ORDER**  
**REGARDING DEPOSITIONS**

20 THE NEW YORK CITY EMPLOYEES' )  
 21 RETIREMENT SYSTEM, THE )  
 22 TEACHERS' RETIREMENT SYSTEM OF )  
 23 THE CITY OF NEW YORK, THE NEW )  
 24 YORK CITY FIRE DEPARTMENT )  
 25 PENSION FUND, THE NEW YORK CITY )  
 26 POLICE PENSION FUND, THE NEW )  
 27 YORK CITY POLICE SUPERIOR )  
 28 OFFICERS' VARIABLE SUPPLEMENTS )  
 FUND, THE NEW YORK CITY POLICE )  
 OFFICERS' VARIABLE SUPPLEMENTS )  
 FUND, THE NEW YORK CITY )  
 FIREFIGHTERS' VARIABLE )  
 SUPPLEMENTS FUND, AND THE NEW )  
 YORK CITY FIRE OFFICERS' VARIABLE )  
 SUPPLEMENTS FUND, AND THE NEW )  
 YORK CITY TEACHERS' RETIREMENT )  
 SYSTEM OF THE CITY OF NEW YORK )

CASE NO.: CV-08-0246-JW

STIP. AND [PROPOSED] ORDER SHORTENING  
 TIME ON MOT. FOR PROTECTIVE ORDER  
 CASE No. C06-04327-JW (PVT) AND  
 CASE No. CV-08-0246-JW (PVT)

1 VARIABLE ANNUITY PROGRAM, )  
2 Plaintiffs, )  
3 v. )  
4 LISA C. BERRY, )  
5 Defendant. )  
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1 WHEREAS, concurrently with filing this Stipulation, defendant Juniper Networks,  
2 Inc. and non-parties Jodi Sutton, Ann Laporte and Ray Martinelli will file a Motion for  
3 Protective Order Regarding Depositions (“Motion for Protective Order”);

4 WHEREAS, the issue raised in the Motion for Protective Order is discrete and the  
5 parties would like to have it heard on the same date as the previously-scheduled hearing on  
6 Lead Plaintiffs’ pending Motion to Compel Juniper Networks, Inc. to Produce Restatement  
7 Communications (Dkt. No. 280 in Case No. 06-04327);

8 WHEREAS, in addition, the Motion for Protective Order concerns certain depositions  
9 that the lead plaintiffs plan to take in August, and the parties need a decision on the Motion  
10 for Protective Order sooner than the standard 35-day notice so they can adequately plan in  
11 advance of the planned depositions;

12 NOW THEREFORE, the parties stipulate, and request that the Court order:

- 13 1. Any opposition(s) to the Motion for Protective Order shall be filed by July 22,  
14 2009;
- 15 2. Any reply in support of the Motion for Protective Order shall be filed by July  
16 28, 2009;
- 17 3. A hearing on the Motion for Protective Order shall be held on August 4, 2009  
18 at 10:00 a.m.

19 IT IS SO STIPULATED.

20 DATED: July 13, 2009

WILSON SONSINI GOODRICH & ROSATI, P.C.  
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23 \_\_\_\_\_  
24 /s/ Joni Ostler

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Non-Party Witnesses Jodi Sutton, Anne Laporte  
and Ray Martinelli*

1 DATED: July 13, 2009

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DATED July 13, 2009

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*Counsel for Defendant Lisa C. Berry*

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\* \* \*

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IT IS SO ORDERED.

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Dated: 7/15/09

  
The Honorable PATRICIA V.  
TRUMBULL

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