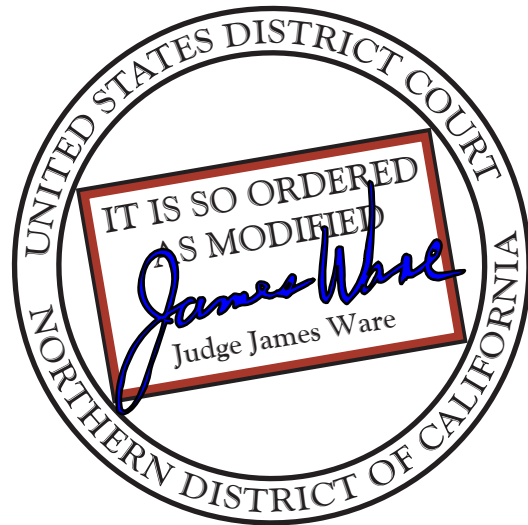


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8 Attorneys for Defendants
 Jeffrey Hall, Richard P. Wallace, and
 9 Nominal Defendant KLA-Tencor Corporation

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

14 In re KLA-TENCOR CORP.
 SHAREHOLDER DERIVATIVE
 15 LITIGATION

Case No. C06-3445-JW

16 This Document Relates To:
 17 ALL ACTIONS

JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DATES FOR
FILING OF LEAD PLAINTIFF'S
AMENDED COMPLAINT AND MOTION
HEARING

20 ALL PARTIES TO THIS ACTION HEREBY STIPULATE AND AGREE AS
 21 FOLLOWS:

22 WHEREAS, on August 27, 2009, the Court issued an order that Lead Plaintiff file an
 23 amended complaint by October 9, 2009, and set a hearing for Defendants' motions to dismiss for
 24 December 14, 2009;

25 WHEREAS, the parties and Defendants' insurers have continued to participate in
 26 mediation of the claims in this action with the assistance of the Hon. Layn Phillips (ret.) as
 27 mediator;

28 WHEREAS, Lead Plaintiff has since the August 27, 2009 Order reached agreements in

1 principle with certain of the individually named Defendants to settle the claims in the Action;

2 WHEREAS, Lead Plaintiff and certain parties and insurance carriers have scheduled
3 another in-person mediation session with Judge Phillips on October 14, 2009 to attempt to settle
4 the claims against some or all of the remaining Individual Defendants prior to filing of an
5 amended complaint;

6 WHEREAS, settlement of some or all of the remaining claims will affect the facts and
7 parties alleged in Lead Plaintiff's amended complaint or render an amended complaint, and
8 motions to dismiss, wholly unnecessary, thereby reducing associated expenses of this litigation to
9 all concerned;

10 WHEREAS, in order to permit the parties to direct their efforts to reach a broader or even
11 a global settlement, the parties respectfully request that the deadline for filing of Lead Plaintiff's
12 amended complaint be extended for 14 days, to and including October 23, 2009, and that a date
13 for hearing of motions to dismiss and a further Case Management Conference be established
14 thereafter, in the event the action is not resolved; and

15 WHEREAS, the parties agree to provide the Court with a status report no later than
16 October 16, 2009 regarding progress toward a broader or global resolution;

17 WHEREFORE, subject to the Court's approval, IT IS HEREBY STIPULATED AND
18 AGREED:

19 1. The parties who have agreed to do so shall attend a scheduled mediation on
20 October 14, 2009.

21 2. If the parties are unable to reach a global settlement, Lead Plaintiff shall file an
22 amended complaint by October 23, 2009 unless otherwise ordered by the Court.

23 3. Defendants shall file their motions in response to Lead Plaintiff's amended
24 complaint within the time provided under the Local Rules and Federal Rules of Civil Procedure,
25 unless hereafter otherwise ordered.

1 4. The Case Management Conference and hearing set for December 14, 2009 on
2 Defendants' motions in response to the amended complaint shall be taken off calendar and
3 rescheduled when such motions, if any, are filed.

4 **SO STIPULATED.**

5 DATED: October 7, 2009

RESPECTFULLY SUBMITTED,

MORGAN, LEWIS & BOCKIUS LLP

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8 By: _____
 /s/
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**Attorneys for Defendants Jeffrey L. Hall,
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13
14 I, Joseph E. Floren, am the ECF User whose ID and password are being used to file this
15 JOINT STATUS STATEMENT. In compliance with General Order 45, X.B., I hereby attest that
16 each of the signatories identified below has concurred in this filing.
17

18 DATED: October 7, 2009

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1 DATED: October 7, 2009

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1 DATED: October 7, 2009

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18 DATED: October 7, 2009

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James Ware
[PROPOSED] ORDER

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**PURSUANT TO STIPULATION, AND GOOD CAUSE APPEARING, IT IS
HEREBY ORDERED THAT:**

1. The parties who have agreed to do so shall attend a scheduled mediation on October 14, 2009.

2. If the parties are unable to reach a global settlement, Lead Plaintiff shall file an amended complaint by October 23, 2009 unless otherwise ordered by the Court.

3. Defendants shall file their motions in response to Lead Plaintiff's amended complaint within the time provided under the Local Rules and Federal Rules of Civil Procedure, unless hereafter otherwise ordered.

4. The hearing set for December 14, 2009 on Defendants' motions in response to the amended complaint is off calendar and will be rescheduled when such motions, if any, are filed.

The Court will conduct a Case Management Conference on **December 14, 2009 at 10 a.m.** as previously scheduled. On or before **December 4, 2009**, the parties shall file a Joint Case Management Statement. The Statement shall include, among other things, an update on the parties' settlement efforts and the parties' proposed schedule re: anticipated Motions to Dismiss.

Dated: October 9, 2009

James Ware

JAMES WARE
United States District Judge