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FRANCIS M. GREGOREK (144785)
gregorek@whafh.com
BETSY C. MANIFOLD (182450)
manifold@whafh.com
RACHELE R. RICKERT (190634)
rickert@whafh.com
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Symphony Tower
750 B Street, Suite 2770
San Diego, CA 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599

****E-Filed 7/17/2009****

BARROWAY TOPAZ KESSLER
MELTZER & CHECK, LLP
NICHOLE BROWNING (251937)
nbrowning@btkmc.com
580 California Street, Suite 1750
San Francisco, CA 94104
Telephone: (415) 400-3004
Facsimile: (415) 400-3001

Attorneys for Lead Plaintiffs

[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re SILICON STORAGE TECHNOLOGY,
INC., DERIVATIVE LITIGATION

Master File No. C 06-04310 JF

**STIPULATION AND ~~PROPOSED~~
ORDER FOR FILING AMENDED
COMPLAINT AND MOTION TO
DISMISS BRIEFING SCHEDULE**

This Document Relates To:
ALL ACTIONS.

Trial Date: None

1 WHEREAS, on July 7, 2009, this Court issued an order granting the Director Defendants'
2 Motions to Dismiss with respect to the federal claims and allowing Lead Plaintiffs leave to amend
3 the Second Verified Consolidated Amended Shareholder Derivative Complaint;

4 WHEREAS, Lead Plaintiffs have requested and Defendants have consented to allow Lead
5 Plaintiffs additional time to file a Third Verified Consolidated Amended Shareholder Derivative
6 Complaint ("Amended Complaint");

7 WHEREAS, a Case Management Conference has been set for November 6, 2009;

8 WHEREAS, subject to the Court's approval, the parties stipulate as follows:

9 1) Lead Plaintiffs shall file an Amended Complaint by August 21, 2009;

10 2) Defendants shall move to dismiss, or otherwise respond to, Lead Plaintiffs'
11 Amended Complaint by September 24, 2009;

12 3) Lead Plaintiffs shall file any opposition to Defendants' motion(s) to dismiss by
13 October 28, 2009;

14 4) If Defendants file and serve a reply to Lead Plaintiffs' opposition, they will do so by
15 November 16, 2009;

16 5) The hearing on Defendants' Motions to Dismiss or other responsive pleading and
17 Case Management Conference shall be set for December 4, 2009 or other day as ordered by the
18 Court.

19 By executing this Stipulation, the parties have not waived and expressly retain all claims,
20 defenses and arguments whether procedural, substantive or otherwise. This Stipulation is without
21 prejudice to any subsequent motion to stay this action, or any objections or defenses thereto, and
22 this Order is entered without prejudice to the rights of any party to apply for a modification of this
23 Order.

24 IT IS SO STIPULATED.

25 DATED: July 16, 2009

Respectfully Submitted,

26 BARROWAY TOPAZ KESSLER
27 MELTZER & CHECK, LLP
28 NICHOLE BROWNING

/S/ Nichole Browning

580 California Street, Suite 1750
San Francisco, CA 94104
Telephone: (415) 400-3004
Facsimile: (415) 400-3001

BARROWAY TOPAZ KESSLER
MELTZER & CHECK, LLP
ERIC L. ZAGAR
JAMES H. MILLER
280 King of Prussia Road
Radnor, PA 19087
Telephone: (610) 667-7706
Facsimile: (610) 667-7056

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
FRANCIS M. GREGOREK
BETSY C. MANIFOLD
RACHELE R. RICKERT
Symphony Towers
750 B Street, Suite 2770
San Diego, CA 92101
Telephone: (619) 239-4599
Facsimile: (619) 234-4599

Attorneys for Lead Plaintiffs

DATED: July 16, 2009

COOLEY GODWARD LLP
JOHN DWYER

/S/ William Freeman

WILLIAM FREEMAN
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Telephones: 650-843-5000
Facsimile: 650-857-0663

*Attorneys for Nominal Defendant, Silicon Storage
Technology, Inc.*

DATED: July 16, 2009

MCDERMOTT, WILL & EMERY LLP

/S/ Matthew J. Jacobs

MATTHEW J. JACOBS

Attorneys for Director Defendants

DATED: July 16, 2009

HOGAN & HARTSON LLP

/S/ Howard S. Caro

HOWARD S. CARO

Attorneys for Officer Defendants

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ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Nichole T. Browning, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 16th day of July, 2009, at San Francisco, California.

/S/ Nichole Browning
NICHOLE BROWNING

* * *

ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN HEREIN, IT IS SO ORDERED.

DATED: July 17, 2009


Judge of the U.S. District Court
Honorable Jeremy Fogel

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on July 16, 2009, I electronically filed the foregoing with the Clerk of
3 the Court using the CM/ECF system which will send notification of such filing to the e-mail
4 addresses denoted on the attached Electronic Mail Notice List.

5 I certify under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct. Executed on July 16, 2009.

7 /S/ Nichole Browning

8 NICHOLE BROWNING
9 BARROWAY TOPAZ KESSLER
10 MELTZER & CHECK, LLP
11 580 California Street, Suite 1750
12 San Francisco, CA 94104
13 Telephone: (415) 400-3004
14 Facsimile: (415) 400-3001
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Mailing Information for a Case 5:06-cv-04310-JF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Norman J. Blears**

njblears@hhlaw.com, dmsalvi@hhlaw.com, lasoboleva@hhlaw.com, rbuehler@hhlaw.com, kelder@hhlaw.com, mjclouse@hhlaw.com, laweiss@hhlaw.com, kwong@hhlaw.com

- **Nichole T. Browning**

nbrowning@sbtclaw.com

- **Jessica Lee Canepa**

jcanepa@mwe.com, clovdahl@mwe.com

- **Howard S. Caro**

hscaro@hhlaw.com, esvanbourg@hhlaw.com, mdewers@hhlaw.com, kwong@hhlaw.com

- **Angela Lucille Dunning**

adunning@cooley.com

- **Kristi Kaye Elder**

kelder@hhlaw.com

- **Lawrence Timothy Fisher**

ltfisher@bramsonplutzik.com, moldenburq@bramsonplutzik.com

- **William S. Freeman**

freemanws@cooley.com, galancr@cooley.com

- **Matthew J. Jacobs**

mjacobs@mwe.com, aleonetti@mwe.com, mparker@mwe.com

- **Eugene S. Litvinoff**

elitvinoff@mwe.com, aleonetti@mwe.com

- **Betsy Carol Manifold**

manifold@whafh.com

- **Alan R Plutzik**

aplutzik@bramsonplutzik.com

- **Kathryn Anne Schofield**

kschofield@bramsonplutzik.com, moldenburq@bramsonplutzik.com

- **Monique R. Sherman**

invalidaddress@invalidaddress.com

- **Eric L. Zagar**

ezagar@sbtclaw.com, kpopovich@sbtclaw.com, der_filings@sbtclaw.com, rwinchester@sbtclaw.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)