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Local Counsel

Lead Counsel for the New York City Pension Funds

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 _____
 12 In re JUNIPER NETWORKS, INC. SECURITIES
 13 LITIGATION

No. C06-04327-JW

14 This Document Relates to:
 15
 16 All Actions

**STIPULATION AND ~~PROPOSED~~
 ORDER WITHDRAWING AS MOOT
 LEAD PLAINTIFF’S MOTION TO
 COMPEL JUNIPER TO PRODUCE
 DRAFTS OF SEC FILINGS**

DATE: April 14, 2009
 TIME: 10:00 a.m.
 BEFORE: Hon. Patricia V. Trumbull

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 28 STIPULATION WITHDRAWING AS MOOT LEAD PLAINTIFF’S MOTION TO COMPEL JUNIPER TO PRODUCE
 DRAFTS OF SEC FILINGS -- CASE NO. C06-04327

{1964 / STIP / 00094944.DOC v1}

1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds, and defendant Juniper Networks, Inc. ("Juniper"), by and through their respective
3 attorneys of record.

4 **WHEREAS**, pursuant to the Court's Order dated March 12, 2009, the hearing on Lead
5 Plaintiff's Motion to Compel Juniper to Produce Drafts of SEC Filings and Other Non-Privileged
6 Documents and an Accompanying Privilege Log is scheduled for April 14, 2009 at 10:00 a.m.
7 and Lead Plaintiff's Reply Memorandum of Law in Support thereof is due on March 31, 2009;
8 and

9 **WHEREAS**, in the interest of judicial economy, the parties have further met and
10 conferred;

11 **NOW, THEREFORE**, Lead Plaintiff withdraws its Motion to Compel (Docket No.
12 228), and the parties stipulate, and request the Court to order, that the hearing scheduled for
13 April 14, 2009 on the Motion to Compel be vacated.

14
15 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

16
17 DATED: April 6, 2009

17 BARBARA J. HART
18 DAVID C. HARRISON
19 JEANNE D'ESPOSITO
20 LOWEY DANNENBERG COHEN & HART, P.C.

20 /s/
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1 WILLEM F. JONCKHEER
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4 /s/

5

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9 *Local Counsel for Lead Plaintiff*

10 NINA F. LOCKER
11 STEVEN GUGGENHEIM
12 JONI OSTLER
13 WILSON SONSINI GOODRICH & ROSATI
14 Professional Corporation

15 /s/

16

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17 650 Page Mill Road
18 Palo Alto, CA 94304-1050
19 Telephone: 650-493-9300

20 *Counsel for Defendant Juniper Networks, Inc.,*

21 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

22 I, Willem F Jonckheer, am the ECF User whose identification and password are being
23 used to file this Stipulation Withdrawing as Moot Lead Plaintiff's Motion to Compel Juniper to
24 Produce Drafts of SEC Filings. I hereby attest that concurrence in the filing of this document
25 along with the concurrently lodged proposed order has been obtained from the other signatory.

26 Dated: April 6, 2009

27 SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP

28 By: _____ /s/
Willem F. Jonckheer

Local Counsel for Lead Plaintiff

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 4/7/09


Hon. Patricia V. Trumbull
United States Magistrate Judge