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10	Local Counsel		
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION		
13	DAIA 1		
14		No. C 06-04327-JW	
15	IN RE JUNIPER NETWORKS, INC.	STIPULATION AND [PROPOSED] ORDER	
16	SECURITIES LITIGATION	ENLARGING LEAD PLAINTIFF'S TIME TO AMEND THE BERRY COMPLAINT AND	
17	This Document Relates to:	SCHEDULING CASE MANAGEMENT CONFERENCE FOUND AS MOOT.	
18	All Actions	CONTERENCE	
19		BEFORE: Hon. James Ware	
20			
21	THE NEW YORK CITY EMPLOYEES' RETIREMENT SYSTEMS, et al.,	No. C08-0246-JW	
22	Plaintiffs,		
23	V.	BEFORE: Hon. James Ware	
24	LISA C. BERRY,		
25	Defendant.		
26 27			
28	STIPULATION AND [PROPOSED] ORDER ENLARGING LEAD PLAINTIFF'S TIME TO AMEND 774564957879/ 00095844.DOC v1} 1 COMPLAINT AND SCHEDULING CASE MANAGEMENT CONFERENCE K:\docs\CLIENTS\1964\stip\00095844.DOC		

This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
 Funds, defendant Lisa C. Berry, defendants Juniper Networks, Inc., Scott Kriens, Pradeep
 Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton
 Sclavos, Vinod Khosla, Kenneth Levy, and William R. Stensrud (the "Juniper Defendants") and
 defendant Ernst & Young, by and through their respective attorneys of record.

WHEREAS, on January 14, 2008, Lead Plaintiff the New York City Pension Funds filed
an action captioned *The New York City Employees, Retirement Systems, et al., v. Lisa C. Berry*,
No. C08-0246-JW (the "Berry Action"), as a related case to the pending class actions under the
caption *In re Juniper Networks, Inc. Securities Litigation*, Lead Case No. C-06-04327-JW (the
"Juniper Action");

WHEREAS, by Order dated October 1, 2008, the Court denied the Juniper Defendants'
Motion to consolidate the Berry Action with the Juniper Action with leave to renew pending
resolution of the Motion to Dismiss in the Berry Action;

14 WHEREAS, by Order dated May 15, 2009, the Court (1) denied Ms. Berry's motion to 15 dismiss Lead Plaintiff's claims under sections 10(b) and 20(a) of the Exchange Act and SEC 16 Rule 10b-5; (2) gave Lead Plaintiff the option of filing, on or before June 5, 2009, an amended 17 complaint in the Berry Action that would "specify in greater detail the nature and extent of 18 Defendant's purported substantial participation" with respect to certain alleged misstatements in 19 the Berry Complaint; and (3) directed Lead Plaintiff and Berry to file a Joint Case Management 20Statement on or before June 5, 2009, and appear for a Case Management Conference on June 15, 21 2009;

WHEREAS, counsel for Lead Plaintiff has conferred with counsel for Defendants
regarding, *inter alia*, filing an omnibus Joint Case Management Statement, and all counsel agree
and request that the status conference scheduled for June 15, 2009 apply in both the Berry Action
and the Juniper Action;

WHEREAS, Lead Plaintiff and defendant Berry agree that Lead Plaintiff's time to amend
the Complaint in the Berry Action should be extended from June 5, 2009 to July 9, 2009; and

28 STIPULATION AND [PROPOSED] ORDER ENLARGING LEAD PLAINTIFF'S TIME TO AMEND THE BERTY 00095844.DOC v1}2 COMPLAINT AND SCHEDULING CASE MANAGEMENT CONFERENCE K:\docs\CLIENTS\1964\stip\00095844.DOC

1	WHEREFORE, the parties stipulate, and request the Court to order, as follows:		
2	1. Lead Plaintiff's time to amend the Complaint in the Berry Action is extended		
3	from June 5, 2009 to July 9, 2009.		
4	2. The parties in the Berry and Juniper Actions shall file Joint Case Management		
5	Statements on or before June 5, 2009, that address, <i>inter alia</i> , the parties' positions with respect		
6	to consolidation of the Actions, class certification and discovery, and appear at the June 15, 2009		
7	Case Management Conference scheduled before Judge Ware.		
8			
9	Respectfully Submitted,		
10			
11	Dated: May 29, 2009LOWEY DANNENBERG COHEN & HART, P.C.		
12			
13	By: <u>/s/ David C. Harrison</u> David C. Harrison		
14	Attorneys for Lead Plaintiffs		
15			
16	I, David C. Harrison, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that		
17			
18	Steven Guggenheim has concurred in this filing, and I have his manual signature on file.		
19	Dated: May 29, 2009WILSON SONSINI GOODRICH & ROSATI		
20	By: /s/		
21	650 Page Mill Road Palo Alto, CA 94304-1050		
22	Telephone: (650) 493-9300 Facsimile: (650) 565-5100		
23	Counsel for the Juniper Defendants		
24			
25	I, David C. Harrison, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that David Friedman has concurred in this filing, and I have his manual signature on file.		
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28	STIPULATION AND [PROPOSED] ORDER ENLARGING LEAD PLAINTIFF'S TIME TO AMEND 749E4BERPY/ 00095844.DOC v1}3 COMPLAINT AND SCHEDULING CASE MANAGEMENT CONFERENCE K:\docs\CLIENTS\1964\stip\00095844.DOC		

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2			
3	Dated: May 29, 2009	LATHAM & WATKINS	
4	<i>Dated</i> . May <i>D</i> , 2005		
5	By:	/s/	
6		505 Montgomery Street, Suite 2000 San Francisco, CA 94111-6538	
7		Telephone: 415-391-0600	
8		Facsimile: 415-395-8095	
9		Counsel for Defendant Ernst & Young	
10		TD and manual and being models file this	
11	I, David C. Harrison, am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that Nancy Harris has concurred in this filing, and I have her manual signature on file.		
12			
		-	
13	Dated: May 29, 2009	ORRICK HERRINGTON & SUTCLIFFE LLP	
14	By:	/s/	
15	Dy.	The Orrick Building	
16		405 Howard Street San Francisco, CA 94105-2669	
17		Telephone: 415-773-5700	
18		Facsimile: 415-773-5759	
19		Counsel for Defendant Lisa C. Berry	
20		¥ ¥	
21	Т	τ, τ.	
22	O R D E R		
23	The stipulation is found as MOOT. Plaintiff has filed an Amended Complaint in the Berry Action on June 5, 2009. The Court declines to set a case management conference on June 15, 2009 in the Juniper Action as this time.		
24			
25	DATED: June 11, 2009	James Ubse	
26		ames Ware United States District Judge	
27		Conneu States District Judge	
28			
	STIPULATION AND [PROPOSED] ORDER ENLARGING COMPLAINT AND SCHEDULING CASE MANAGEMENT K:\docs\CLIENTS\1964\stip\00095844.DOC	Lead Plaintiff's Time to Amend <b>71964B 5FP</b> V/ 00095844.DOC v1}4 Conference	

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