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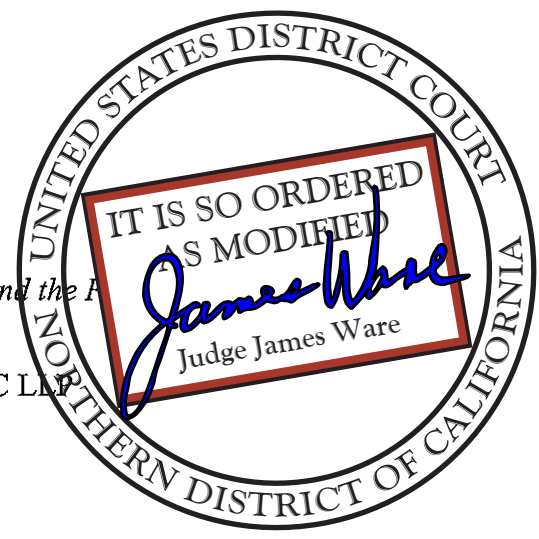
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION



IN RE JUNIPER NETWORKS, INC.
SECURITIES LITIGATION

This Document Relates to:
All Actions

No. C 06-04327-JW

**STIPULATION AND [PROPOSED] ORDER
SETTING DEADLINE FOR PARTIES TO
FILE JOINT STATUS REPORT RE:
DISCOVERY**

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

6 WHEREAS, on November 3, 2008, the parties filed the Discovery Plan which was
7 entered by the Court on November 17, 2008. The Discovery Plan, among other things, set
8 deadlines for fact and expert discovery and summary judgment motions as follows:

ACTION	DUE DATE
Fact discovery cut-off	December 1, 2009, subject to review
Exchange of expert reports	February 1, 2010
Exchange of rebuttal expert reports	60 days after exchange of expert reports
Expert deposition deadline	60 days after exchange of rebuttal reports
Dispositive motion cut-off	No later than 45 days after close of expert discovery

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14 WHEREAS, following the entry of the Discovery Plan, the parties in this action (the
15 “Juniper Action”) have engaged in substantial document discovery; and have begun deposition
16 discovery;

17 WHEREAS, in light of the foregoing, counsel for the parties request that the Court
18 schedule a joint case management conference to follow the September 14, 2009 hearing on class
19 certification to address the Discovery Plan deadlines and related discovery matters;

20 WHEREFORE, the parties stipulate, and request the Court to order, as follows:

- 21 1. The parties in the Juniper Action shall appear for a case management
22 conference immediately following the 9:00 a.m. September 14, 2009 class
23 certification hearing scheduled before Judge Ware.
- 24 2. The parties shall file a joint case management statement on or before
25 September 4, 2009.

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27 SO STIPULATED.
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1 Dated: August 17, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

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3 By: _____ /s/

4 David C. Harrison
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9 *Attorneys for Lead Plaintiffs*

10 I, David C. Harrison, am the ECF user whose ID and password are being used to file this
11 Stipulation and [Proposed] Order Scheduling Case Management Conference. In compliance
12 with General Order 45, X.B., I hereby attest that Joni Ostler has concurred in this filing, and I
13 have her manual signature on file.

14 Dated: August 17, 2009

WILSON SONSINI GOODRICH & ROSATI

15 By: _____ /s/

16 Nicki Locker
17 Joni Ostler
18 650 Page Mill Road
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20 Telephone: (650) 493-9300
21 Facsimile: (650) 565-5100
22 *Counsel for the Juniper Defendants*

23 I, David C. Harrison, am the ECF user whose ID and password are being used to file this
24 Stipulation and [Proposed] Order Scheduling Case Management Conference. In compliance
25 with General Order 45, X.B., I hereby attest that Vivianne Stapp has concurred in this filing, and I
26 have her manual signature on file.

27 Dated: August 17, 2009

LATHAM & WATKINS

28 By: _____ /s/

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Counsel for Defendant Ernst & Young


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*** ORDER ***

Upon evaluation of the parties' Stipulation, the Court finds that prior to setting a Further Case Management Conference, it would be fruitful for the Court to receive and review the parties' Joint Status Report re: Discovery. Accordingly, on or before **September 4, 2009**, the parties shall file their Joint Status Report. The Report shall include, among other things, an update on the parties' discovery efforts and if relevant, any request for modification of the current Case Schedule. Upon reviewing the parties' Joint Status Report, the Court will set a Conference to coincide with the hearing on Plaintiffs' Motion for Class Certification, if necessary.

Dated: September 1, 2009



JAMES WARE
United States District Judge