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4	Email: jostler@wsgr.com WILSON SONSINI GOODRICH & ROSATI	STATE SI
	Professional Corporation	
5	650 Page Mill Road Palo Alto, CA 94304-1050	DENIED
6	Telephone: (650) 493-9300 Facsimile: (650) 565-5100	- James Ward Z
7	Attorneys for Defendants Juniper Networks, Inc.,	Judge James Ware
8	Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman,	
9	William R. Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth Levy and	ERN OF CE
10	William R. Stensrud	ERN DISTRICT OF
11	UNITED STATES D	ISTRICT COURT
12		
13	NORTHERN DISTRIC	
14	SAN JOSE I	DIVISION
15	In re JUNIPER NETWORKS, INC. SECURITIES LITIGATION	) CASE NO.: C06-04327-JW
16	SECURITIES LITIGATION	
17		STIPULATION AND [PROPOSED] ORDER FOR
18	This Document Relates To:	<ul> <li>SHORTENED TIME FOR</li> <li>HEARING MOTION TO</li> </ul>
19	All Actions	) CONSOLIDATE RELATED ) CASES
20		
20		$ \begin{array}{c} - \\ \end{array} $
21	THE NEW YORK CITY EMPLOYEES' RETIREMENT SYSTEM, THE	) CASE NO.: CV-08-0246-JW
	TEACHERS' RETIREMENT SYSTEM OF THE CITY OF NEW YORK, THE NEW	
23	YORK CITY FIRE DEPARTMENT PENSION FUND, THE NEW YORK CITY	)
24	POLICE PENSION FUND, THE NEW YORK CITY POLICE SUPERIOR	)
25	OFFICERS' VARIABLE SUPPLEMENTS FUND, THE NEW YORK CITY POLICE	
26	OFFICERS' VARIABLE SUPPLEMENTS FUND, THE NEW YORK CITY	)
27	FIREFIGHTERS' VARIABLE SUPPLEMENTS FUND, AND THE NEW	
28	STIPULATION AND [PROPOSED] ORDER FOR SHORTENED TIME FOR HEARING MOTION TO	,
	CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND	
	CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW	
		Dockets.Justia.com

1	YORK CITY FIRE OFFICERS' VARIABLE )
2	SUPPLEMENTS FUND, AND THE NEW
2	YORK CITY TEACHERS' RETIREMENT ) SYSTEM OF THE CITY OF NEW YORK ) VARIABLE ANNUITY PROGRAM, )
4	Plaintiffs,
5	V.
6	) LISA C. BERRY,
7	) Defendant.
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28	STIPULATION AND [PROPOSED] ORDER FOR SHORTENED TIME FOR HEARING MOTION TO CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW

1	WHEREAS, defendant Juniper Networks, Inc. and individual defendants Scott		
2	Kriens, Pradeep Sindhu, Marcel Gani, Robert Calderoni, Kenneth Goldman, William R.		
3	Hearst, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud		
4	(collectively, the "Juniper Defendants") filed a Motion to Consolidate Related Cases		
5	("Motion to Consolidate") on October 6, 2009;		
6	WHEREAS, the New York City Employees' Retirement System, et al. v. Berry case		
7	(the "Berry Action") is currently scheduled for a case management conference on October		
8	19, 2009, and a decision on the Motion to Consolidate has bearing on the issues to be		
9	discussed at that case management conference;		
10	WHEREAS, in the interests of efficiency for the Court and the parties, the parties		
11	propose that the Motion to Consolidate should be considered at the same time as the case		
12	management conference on October 19, 2009, and the parties have agreed to an expediting		
13	briefing schedule to accomplish this;		
14	NOW THEREFORE, the parties hereby stipulate, and request that the Court order, as		
15	follows:		
16	1. Any responses to the Motion to Consolidate, whatever those responses may		
17	be, shall be filed (and served on all other parties via email) no later than noon Pacific time on		
18	October 12, 2009;		
19	2. Any reply in support of the Motion to Consolidate shall be filed by October		
20	14, 2009; and		
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28	STIPULATION AND [PROPOSED] ORDER RE -1- BRIEFING ON MOTION TO CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW		

1	3. A hearing on the Motio	on to Consolidate shall be held on October 19, 2009 at
2	9:00 a.m.	
3	IT IS SO STIPULATED.	
4	DATED: October 6, 2009	WILSON SONSINI GOODRICH & ROSATI, P.C. NINA F. LOCKER
5		STEVEN GUGGENHEIM JONI OSTLER
6 7		
-		/s/ Joni Ostler Joni Ostler
8		650 Page Mill Road
9 10		Palo Alto, CA 94304-1050 Telephone: 650/493-9300 650/493-6811 (fax)
11		Counsel for Defendants Juniper Networks, Inc.,
12		Scott Kriens, Pradeep Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R.
13		Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth Levy and William R. Stensrud
14		
15	DATED: October 6, 2009	BARBARA J. HART DAVID C. HARRISON
		LOWEY DANNENBERG COHEN & HART, P.C.
16		
17		/s/ David C. Harrison
18		DAVID C. HARRISON One North Broadway, 5th Floor
19		White Plains, NY 10601-2310
20		914-733-7228 (telephone) 914-997-0035 (facsimile)
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22		Lead Counsel for Lead Plaintiff
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24		Two Embarcadero Center, Suite 1050 San Francisco, CA 94111
25		Telephone: 415-788-4220
26		Local Counsel for Lead Plaintiff
27		
28	STIPULATION AND [PROPOSED] ORDER RE BRIEFING ON MOTION TO CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW	-2-

1	1 DATED October 6, 2009 PETE	R A. WALD
2		ICK E. GIBBS
		D M. FRIEDMAN REW M. FARTHING
3	<b>3</b>	AM & WATKINS LLP
4	4	
5	5	/s/ David M. Friedman DAVID M. FRIEDMAN
6	505 M	ontgomery Street, Suite 2000 ancisco, CA 94111
	Telent	none: 415-391-0600
7	-	
8	8 Couns	el for Defendant Ernst & Young LLP
9	DATED October 6, 2009 MELI	NDA HAAG
10		S N. KRAMER
11		CY E. HARRIS CCA F. LUBENS
	ORRI	CK, HERRINGTON & SUTCLIFFE LLP
12	2	
13	3	/s/ Rebecca F. Lubens REBECCA F. LUBENS
14		rrick Building
15		oward Street ancisco, CA 94105-2669
16	Teleph	none: 415-773-5700
10	Couns	el for Defendant Lisa C. Berry
18		*
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20		DALEA JAMES WARE
21	1 DENIET	1 hall
22	2 Mamee	WWW T Z
23	3 Judge James	Ware
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28	8 STIPULATION AND [PROPOSED] ORDER RE -3 BRIEFING ON MOTION TO CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW	-

1	ECF CERTIFICATION	
2	I, Joni Ostler, am the ECF User whose identification and password are being used to file	
3	this STIPULATION AND [PROPOSED] ORDER FOR SHORTENED TIME FOR HEARING	
4	MOTION TO CONSOLIDATE RELATED CASES. In compliance with General Order 45.X.B,	
5	I hereby attest that David C. Harrison, David M. Friedman and Rebecca F. Lubens have all	
6	concurred in this filing.	
7	Dated October 6, 2009 WILSON SONSINI GOODRICH & ROSATI Professional Corporation	
8		
9	By: /s/ Ioni Ostler	
10	By: <u>/s/ Joni Ostler</u> Joni Ostler	
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28	STIPULATION AND [PROPOSED] ORDER RE -4- BRIEFING ON MOTION TO CONSOLIDATE RELATED CASES CASE NO. C06-04327-JW AND CASE NO. CV-08-0246-JW	