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 11 *Goldman, William R. Hearst III, Stratton*  
 12 *Sclavos, Vinod Khosla, Kenneth Levy and*  
 13 *William R. Stensrud (the "Juniper*  
 14 *Defendants")*

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*Inc.*

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION

16 In re JUNIPER NETWORKS, INC.  
 17 SECURITIES LITIGATION

) CASE NO.: C06-04327-JW (PVT)  
 )  
 ) STIPULATION AND [~~PROPOSED~~]  
 ) ORDER RE THE JUNIPER  
 ) DEFENDANTS' SECOND SET OF  
 ) REQUESTS FOR ADMISSION AND  
 ) SIXTH SET OF INTERROGATORIES

19 \_\_\_\_\_ )  
 20 This Document Relates To:

21 All Actions )  
 22 )  
 23 )  
 24 )  
 25 )  
 26 )  
 27 )  
 28 )

BEFORE: Hon. Patricia V. Trumbull

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

6 WHEREAS, on November 30, 2009, Lead Plaintiff served its Responses and Objections  
7 to the Juniper Defendants' Second Set of Requests for Admission and Sixth Set of  
8 Interrogatories (collectively, "Requests");

9 WHEREAS, the parties met and conferred on December 2, 2009, and Lead Plaintiff  
10 agreed to serve amended responses to the Requests on or before January 11, 2010;

11 WHEREAS, pursuant to the same meet and confer, the parties also agreed that if the  
12 Juniper Defendants believe Lead Plaintiff's amended responses are still deficient, and the parties  
13 cannot resolve the dispute through further meet and confers, the Juniper Defendants may file and  
14 serve a motion to compel further responses to the Requests within ten days from the date on  
15 which the parties reach an impasse, but in no event later than January 29, 2010.

16 THEREFORE, the parties stipulate, and request that the Court order, as follows:

17 If the parties have disputes regarding the sufficiency of Lead Plaintiff's responses to the  
18 Juniper Defendants' Second Set of Requests for Admission and Sixth Set of Interrogatories that  
19 cannot be resolved through meet and confers, the Juniper Defendants may file and serve a  
20 motion to compel further responses to the Second Set of Requests for Admission and Sixth Set of  
21 Interrogatories within ten days from the date on which the parties reach an impasses, but in no  
22 event later than January 29, 2010, and such motion will not be deemed untimely.

23 Respectfully submitted,

24 Dated: December 3, 2009

WILSON SONSINI GOODRICH & ROSATI

25 By: /s/ Joni Ostler  
26 Joni Ostler

27 *Counsel for the Juniper Defendants*

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Dated: December 3, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

By:           /s/ Deborah Rogozinski            
          Deborah Rogozinski

*Counsel for Lead Plaintiff*

\* \* \*

O R D E R

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:           12/7/09          

  
PATRICIA V. TRUMBULL  
United States Magistrate Judge