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 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
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)

) **STIPULATION AND**
) **[PROPOSED] ORDER**
) **CONTINUING DEADLINE FOR**
) **EXCHANGE OF EXPERT**
) **REPORTS**

19 _____
 20 This Document Relates To:

21 All Actions
 22 _____
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STIPULATION AND [PROPOSED] ORDER
 CONTINUING DEADLINE FOR EXCHANGE OF
 EXPERT REPORTS
 CASE No. C06-04327-JW (PVT)

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 (the "Juniper Defendants"), and Defendant Ernst &
5 Young LLP ("EY"), by and through their respective attorneys of record.

6 WHEREAS, the Stipulated Discovery Plan entered in this action on November 17,
7 2008 (Dkt. No. 179) provides that the parties shall exchange expert reports on February 1,
8 2010, rebuttal expert reports sixty (60) days thereafter, and shall complete expert depositions
9 sixty (60) days after the exchange of rebuttal reports;

10 WHEREAS, the parties have agreed, and Magistrate Judge Trumbull has ordered, that
11 certain depositions take place in December 2009 and January 2010 notwithstanding the close
12 of fact discovery on December 1, 2009;

13 WHEREAS, Lead Plaintiff and the Juniper Defendants will participate in settlement
14 mediation on February 4 and 5, 2010;

15 WHEREAS, for both of the above reasons, the parties agree that the deadline for
16 exchanging expert reports should be continued to March 23, 2010, with the remaining expert
17 discovery deadlines adjusted accordingly;

18 NOW, THEREFORE, the parties stipulate and request that the Court enter an Order
19 that:

20 1. The date for the exchange of expert reports set forth in the Stipulated Discovery
21 Plan (Dkt. No. 179) is continued from February 1, 2010 to March 23, 2010;

22 2. The parties shall exchange rebuttal expert reports sixty (60) days after the
23 exchange of expert reports, and shall complete expert discovery 60 days after the exchange of
24 rebuttal expert reports.

1 IT IS SO STIPULATED.

2 DATED: January 5, 2010

WILSON SONSINI GOODRICH & ROSATI, P.C.
NINA F. LOCKER
STEVEN GUGGENHEIM
JONI OSTLER

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/s/ Nina F. Locker

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M. Calderoni, Kenneth Goldman, William R.
Hearst III, Stratton Sclavos, Vinod Khosla, Kenneth
Levy and William R. Stensrud*

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10

11 DATED: January 5, 2010

PETER A. WALD
PATRICK E. GIBBS
DAVID M. FRIEDMAN
ANDREW M. FARTHING
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/s/ David M. Friedman

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David M. Friedman

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Counsel for Defendant Ernst & Young LLP

18 DATED: January 5, 2010

BARBARA J. HART
DAVID C. HARRISON
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/s/ Barbara J. Hart

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Local Counsel for Lead Plaintiff

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IT IS SO ORDERED.

Dated: January 12, 2010


The Honorable JAMES WARE

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ECF CERTIFICATION

I, Joni Ostler, am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER CONTINUING DEADLINE FOR EXCHANGE OF EXPERT REPORTS. In compliance with General Order 45.X.B, I hereby attest that Nina F. Locker, David M. Friedman and Barbara J. Hart have all concurred in this filing.

Dated: January 5, 2010

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Joni Ostler
Joni Ostler