1 2 3 4 5 6 7	Bingham McCutchen LLP DAVID BALABANIAN (SBN 37368) david.balabanian@bingham.com CHARLENE S. SHIMADA (SBN 91407) charlene.shimada@bingham.com JOHN D. PERNICK (SBN 155468) john.pernick@bingham.com Three Embarcadero Center San Francisco, CA 94111-4067 Telephone: 415.393.2000 Facsimile: 415.393.2286  Attorneys for Defendants		
8	Hansen Medical, Inc., Fredrick H. Moll and Steven M. Van Dick		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	SAN JOSE DIVISION		
12			
13 14	ROBERT CURRY, Individually and on behalf of all others similarly situated,	Case No. 09-cv-5094 JF  STIPULATION AND [PROPOSED]	
15 16	Plaintiff, v.	ORDER PER LOCAL RULE 6-2 SETTING TIME FOR FILING OF AMENDED COMPLAINT AND FOR DEFENDANTS' RESPONSES TO	
17 18	HANSEN MEDICAL INC., FREDERICK H. MOLL and STEVEN M. VAN DICK,  Defendants.	COMPLAINT	
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28	A/73257232.1/3000111-0000343620		

1	WHEREAS, the above-captioned action was filed on October 23, 2009, alleging		
2	violations of the federal securities laws against Defendants Hansen Medical, Inc., Frederic H.		
3	Moll and Steven M. Van Dick (collectively, "Defendants"), and is subject to the requirements of		
4	the Private Securities Litigation Reform Act of 1995 (the "Reform Act"), including consolidation		
5	of related actions, the appointment of a lead plaintiff and approval of lead counsel. 15 U.S.C.		
6	§78u-4(a)(3);		
7	WHEREAS, on December 22, 2009, Mina Farr and Nader Farr ("Proposed Lead		
8	Plaintiffs") filed their Motion for Consolidation of Related Actions, Appointment as Lead		
9	Plaintiff, and Approval of Lead Counsel. No other parties have filed motions for appointment as		
10	lead plaintiff.		
11	WHEREAS, the hearing on Proposed Lead Plaintiffs' motion for appointment is set for		
12	January 29, 2010.		
13	IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-2, by and		
14	between plaintiff Robert Curry, Proposed Lead Plaintiffs, and Defendants, through their		
15	respective counsel, as follows:		
16	1. Defendants, without waiving any defense based on lack of jurisdiction or		
17	improper venue or any claim of forum non conveniens, authorize their counsel to accept service		
18	of the complaint filed by Plaintiff in this action.		
19	2. The lead plaintiff selected by the court pursuant to § 78u-4(a)(3) of the		
20	Securities Exchange Act of 1934 (15 U.S.C. §§ 78a et seq.), as amended by the Reform Act,		
21	shall have sixty days from entry of the order designating lead plaintiff and lead counsel to file an		
22	amended complaint in this proceeding.		
23	3. The time within which Defendants must answer, move or otherwise respond to		
24	the complaint in this action is extended until sixty days after service on Defendants by lead		
25	plaintiff of an amended complaint.		
26	4. In the event that Defendants move to dismiss the complaint, lead plaintiff shall		
27	have forty-five days to file its opposition brief and Defendants shall have leave to file a reply		
28	brief thirty days following service of the opposition brief. A/73257232.1/3000111-0000343620 1		

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2	DATED: January 1, 2010	BINGHAM MCCUTCHEN LLP
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5		By: John D. Pernick
6		Attorneys for Defendants Hansen Medical, Inc., Fredrick H. Moll and
7		Hansen Medical, Inc., Fredrick H. Moll and Steven M. Van Dick
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9	DATED: January <u>14</u> , 2010	GLACY, BINKOW & GOLDBERG LLP
10		
11		By: Ly 3. Cy
12		Lionel Z. Glancy
13		Attorneys for Plaintiff Robert Curry and Proposed Lead Plaintiffs Mina Farr and Nader Farr
14		and Nader Farr
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## [PROPOSED] ORDER IT IS SO ORDERED. DATED: \_\_\_\_\_, 2010 By: The Honorable Jeremy Fogel United States District Court Judge

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