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****E-Filed 3/12/2010****

***Lead Counsel for Lead Plaintiffs
Mina Farr and Nader Farr***

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ROBERT CURRY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

HANSEN MEDICAL, INC., FREDERIC H.
MOLL and STEVEN M. VAN DICK,

Defendants.

AND RELATED ACTIONS.

Lead Case No. 5:09-cv-05094-JF

**STIPULATION AND [PROPOSED]
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE**

Current CMC Date: March 19, 2010

Time: 10:30 AM

Judge: Hon. Jeremy Fogel

STIPULATION

WHEREAS on October 23, 2009, the first of three federal securities class actions against Hansen Medical, Inc. and certain Individual Defendants was filed in this Court: *Curry v. Hansen Medical, Inc., et al.*, Case No. C-09-05094-JF (N.D. Cal. Oct. 23, 2009) (Doc. #1);

WHEREAS on October 23, 2009, the Court entered an Order Setting Initial Case Management Conference and ADR Deadlines (Doc. #5) setting deadlines for, among other

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STIPULATION AND [PROPOSED] ORDER CONTINUING INITIAL CASE MANAGEMENT CONFERENCE

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1 things, the parties to meet and confer regarding ADR process selection and filing an ADR
2 Certification, as well as scheduling an Initial Case Management Conference (“CMC”) for March
3 19, 2010 at 10:30 AM, and setting deadlines for associated pre-conference filings, including the
4 Case Management Statement, Rule 26(f) Report and Initial Disclosures;

5 WHEREAS by Order dated January 25, 2010 (Doc #11), the Court entered a stipulation
6 and order setting the time for filing of an amended complaint and Defendants’ responses, which
7 provides, *inter alia*, that the Court-appointed lead plaintiff(s) shall have sixty days from entry of
8 the order designating lead plaintiff(s) to file an amended complaint in this proceeding and that
9 the time within which Defendants must answer, move or otherwise respond to the complaint in
10 this action is extended until sixty days after service on Defendants of an amended complaint;

11 WHEREAS by Order dated February 25, 2010 (Doc. #15), these three federal securities
12 class actions were consolidated in this Court;

13 WHEREAS by Order dated February 25, 2010 (Doc. #15), the Court appointed Mina
14 Farr and Nader Farr as Lead Plaintiffs (“Lead Plaintiffs”) and Glancy Binkow & Goldberg LLP
15 as Lead Counsel (“Lead Counsel”);

16 WHEREAS pursuant to the Private Securities Litigation Reform Act (the “PSLRA”), 15
17 U.S.C. § 78u-4(b)(3)(B), all discovery and other proceedings are stayed during the pendency of
18 any motion to dismiss absent a finding that particularized discovery is necessary to preserve
19 evidence or to prevent undue prejudice;

20 WHEREAS the counsel for Defendants and Lead Counsel have conferred and believe
21 that in light of the provisions of 15 U.S.C. § 78u-4(b)(3)(B) and in the interests of judicial
22 economy, the currently scheduled CMC and related filings set forth in the Court’s October 23,
23 2009, Order Setting Initial Case Management Conference and ADR Deadlines (Doc. #5) are
24 premature at this stage of the litigation and should be continued until the Court has ruled on any
25 motion to dismiss the forthcoming consolidated amended complaint;

26 THEREFORE IT IS STIPULATED AND AGREED that:
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1 1. The CMC, currently scheduled for March 19, 2010, shall be continued until
2 another date that is convenient for the Court after the Court has ruled on any motion to dismiss
3 the forthcoming consolidated amended complaint;

4 2. All deadlines set forth in the Court's October 23, 2009 Order Setting Initial Case
5 Management Conference and ADR deadline (Doc. #5) shall be continued consistently therewith,
6 including the deadlines for the parties to meet and confer regarding ADR process selection and
7 filing an ADR Certification, and the deadlines for associated pre-conference filings, including
8 the Case Management Statement, Rule 26(f) Report and Initial Disclosures.
9

10 **IT IS SO STIPULATED.**

11 DATED: March 11, 2010

GLANCY BINKOW & GOLDBERG LLP

13 By: /s/ Peter A. Binkow
14 Peter A. Binkow

15 *Lead Counsel for Lead Plaintiffs*

16
17 DATED: March 11, 2010

BINGHAM MCCUTCHEN LLP

18 By: /s/ Charlene S. Shimada
19 David M. Balabanian (# 37368)
20 Charlene S. Shimada (# 91407)
21 John D. Pernick (#155468)

22 *Counsel for Defendants Hansen Medical, Inc.,
23 Fredric H. Moll and Steven M. Van Dick*
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~~PROPOSED~~ ORDER

IT IS SO ORDERED.

DATED: 3/12/2010 , 2010

By: _____


The Honorable Jeremy Fogel
United States District Court Judge

1 I, Peter A. Binkow, am the ECF user whose identification and password are being used to
2 file the Stipulation and [Proposed] Order Continuing Initial Case Management Conference. In
3 compliance with General Order 45.X.B, I hereby attest that Charlene S. Shimada has concurred
4 in this filing.
5

6 GLANCY BINKOW & GOLDBERG LLP

7 By: /s/ Peter A. Binkow

8 Peter A. Binkow
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1 **PROOF OF SERVICE BY ELECTRONIC POSTING PURSUANT TO NORTHERN**
2 **DISTRICT OF CALIFORNIA LOCAL RULES AND ECF GENERAL ORDER NO. 45**
3 **AND BY MAIL ON ALL KNOWN NON-REGISTERED PARTIES**

4 I, the undersigned, say:

5 I am a citizen of the United States and am employed in the office of a member of the Bar of
6 this Court. I am over the age of 18 and not a party to the within action. My business address is 1801
7 Avenue of the Stars, Suite 311, Los Angeles, California 90067.

8 On March 11, 2010, I caused to be served the following document:

9 **STIPULATION AND [PROPOSED] ORDER CONTINUING INITIAL CASE**
10 **MANAGEMENT CONFERENCE**

11 on all ECF-registered parties in the action as follows:

12 Michael M. Goldberg
13 info@glancylaw.com

14 John D. Pernick
15 john.ernick@bingham.com,david.balabanian@bingham.com

16 Christopher Paul Seefer
17 chriss@csgrr.com,jdecena@csgrr.com,khuang@csgrr.com,e_file_sf@csgrr.com,e_file_sd@csgrr
18 .com

19 Shawn A. Williams
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 Ira M. Press
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1 and on the following non-ECF registered parties:

2 Catherine J Kowalewski
3 Coughlin Stoia Geller Rudman & Robbins LLP
4 655 W Broadway #1900
San Diego, CA 92101

Tamar A Weinrib
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5 Marc I. Gross
6 Pomerantz Haudek Block Grossman & Gross
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26th Floor
7 New York, NY 10017

8
9 **By Mail:** By placing true and correct copies thereof in individual sealed envelopes, with
10 postage thereon fully prepaid, which I deposited with my employer for collection and mailing by
11 the United States Postal Service. I am readily familiar with my employer's practice for the
collection and processing of correspondence for mailing with the United States Postal Service. In
the ordinary course of business, this correspondence would be deposited by my employer with the
United States Postal Service that same day.

12 I certify under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct. Executed on March 11, 2010, at Los Angeles, California.

14
15 *s/Peter A. Binkow*
Peter A. Binkow
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