

1 LIONEL Z. GLANCY (#134180)  
 2 MICHAEL GOLDBERG (#188669)  
 3 GLANCY BINKOW & GOLDBERG LLP  
 4 1801 Avenue of the Stars, Suite 311  
 5 Los Angeles, California 90067  
 Telephone: (310) 201-9150  
 Facsimile: (310) 201-9160  
 E-mail: [info@glancylaw.com](mailto:info@glancylaw.com)

6 *Lead Counsel for Plaintiffs*

7  
 8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10 SAN JOSE DIVISION

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

13 Plaintiff,

14 v.

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

17 Defendants.

No. 5:09-cv-05094-JF

Class Action

**STIPULATION AND [PROPOSED]  
 ORDER RE FILING OF A  
 CONSOLIDATED AMENDED  
 COMPLAINT AND DEFENDANTS'  
 RESPONSES THERETO**

Judge: Hon. Jeremy Fogel

18  
 19 WHEREAS, by Order filed January 25, 2010 (Docket #11), the Court entered a stipulation  
 20 and order setting the time for filing of an amended complaint and Defendants' responses thereto,  
 21 which provides, *inter alia*, that the Court-appointed lead plaintiff(s) shall have sixty days from entry  
 22 of the order designating lead plaintiff(s) to file an amended complaint;

23  
 24 WHEREAS, by Order dated February 25, 2010 (Docket #15), the Court appointed Mina Farr  
 25 and Nader Farr as Lead Plaintiffs ("Lead Plaintiffs") and Glancy Binkow & Goldberg LLP as Lead  
 26 Counsel ("Lead Counsel"), and two related securities class actions – *Livingstone v. Hansen Medical,*  
 27 *Inc. et al.*, No. C-09-5212 and *Prenter v. Hansen Medical, Inc. et al.*, No. 09-5367-CRB – were  
 28 consolidated in this Court with the above-captioned action;

No. 09-cv-05094-JF

STIPULATION AND [PROPOSED] ORDER RE FILING OF AMENDED COMPLAINT AND DEFENDANTS' RESPONSES THERETO

Page 1

1           WHEREAS, in accordance with the Court's January 25, 2010 Order, Lead Plaintiffs shall  
2 file an amended complaint in the consolidated action on or before April 26, 2010; Defendants shall  
3 respond to the amended complaint on or before June 25, 2010; and, in the event Defendants file a  
4 motion to dismiss the complaint, Lead Plaintiffs shall respond to any motion to dismiss on or before  
5 August 9, 2010, and Defendants shall file any opposition brief on or before September 8, 2010;

6           WHEREAS, counsel for Defendants and Lead Counsel have conferred and agreed to allow  
7 Lead Plaintiffs fourteen additional days in which to file a consolidated amended complaint;

8           NOW, THEREFORE, the undersigned parties hereby stipulate and agree, and respectfully  
9 request that the Court enter an Order as follows:  
10

11           1.       Lead Plaintiffs shall file a consolidated amended complaint on or before May 10,  
12 2010.

13           2.       Defendants shall respond to the consolidated amended complaint on or before July  
14 9, 2010.

15           3.       Lead Plaintiffs shall respond to any motion to dismiss the complaint on or before  
16 August 23, 2010.

17           4.       Defendants shall file any reply brief on or before September 22, 2010.  
18

19           **IT IS SO STIPULATED.**

20  
21 DATED: April 15, 2010

**GLANCY BINKOW & GOLDBERG LLP**

22  
23 By: /s/ Michael Goldberg

Lionel Z. Glancy

24 Michael Goldberg

25 *Lead Counsel for Lead Plaintiffs*  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: April 15, 2010

**BINGHAM MCCUTCHEN LLP**

By: /s/ Charlene S. Shimada  
David M. Balabanian (# 37368)  
Charlene S. Shimada (# 91407)  
John D. Pernick (#1155468)

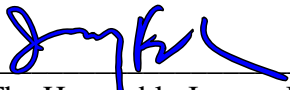
*Counsel for Defendants Hansen Medical, Inc.,  
Frederic H. Moll, and Steven M. Van Dick*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 4/26, 2010

By:   
The Honorable Jeremy Fogel  
United States District Judge



## Mailing Information for a Case 5:09-cv-05094-JF

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Peter Arthur Binkow**  
info@glancylaw.com,pbinkow@glancylaw.com
- **Michael M. Goldberg**  
info@glancylaw.com
- **John D. Pernick**  
john.pernick@bingham.com

### Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

**Lionel Z Glacny**  
Glancy Binkow & Goldberg LLP  
1801 Avenue of the Stars  
Suite 311  
Los Angeles, CA 90067