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 Celera Corporation and Defendants  
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 8 Richard A. Ayers, Jean-Luc Bélingard,  
 William G. Green, Peter Barton Hutt,  
 9 Gail K. Naughton, Wayne I. Roe, and Bennett M. Shapiro

10 [Additional counsel appear on signature page.]

11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA  
 13 SAN JOSE DIVISION

15 In re CELERA CORP. DERIVATIVE LITIG.

Case No. 10-cv-02935-EJD

**DERIVATIVE ACTION**

**STIPULATION EXTENDING  
 DEFENDANTS' TIME TO  
 RESPOND TO PLAINTIFFS'  
 AMENDED CONSOLIDATED  
 VERIFIED SHAREHOLDER  
 DERIVATIVE COMPLAINT  
 PURSUANT TO LOCAL  
 RULE 6-1(A)**

18 This Document Relates To:

19 ALL ACTIONS  
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1 Pursuant to Civil Local Rule 6-1(a) for the Northern District of California, the parties, by  
2 and through their undersigned counsel, stipulate as follows:

3 WHEREAS, on June 14, 2010, a securities class action entitled *Washtenaw County*  
4 *Employees' Retirement System v. Celera Corporation*, Case No. C 10-2604-EJD (the "Securities  
5 Action") was filed in United States District Court for the Northern District of California;

6 WHEREAS, on July 2 and 9, 2010, plaintiffs Alan R. Kahn and Betty Greenberg  
7 ("Plaintiffs") filed the present shareholder derivative actions, which were consolidated into a single  
8 action on September 23, 2010;

9 WHEREAS, on August 11, 2010, the Court related the present action to the Securities  
10 Action;

11 WHEREAS, on April 22, 2011, Plaintiffs in the present action filed their Amended  
12 Consolidated Verified Shareholder Derivative Complaint (the "Amended Complaint") against  
13 nominal defendant Celera Corporation and certain of its officers and directors ("Defendants")  
14 alleging breach of fiduciary duty and unjust enrichment;

15 WHEREAS, plaintiffs in the above-referenced and related Securities Action currently are  
16 scheduled to file an amended complaint on or before May 6, 2011, and the parties currently are  
17 scheduled to complete briefing on defendants' anticipated motion to dismiss in the Securities  
18 Action on or before September 1, 2011;

19 WHEREAS, the present action relies upon many of the same underlying facts and events as  
20 those at issue in the Securities Action; and

21 WHEREAS, the parties agree that, in the interests of efficiency and judicial economy,  
22 briefing and hearing of Defendants' anticipated motions to dismiss the Amended Complaint should  
23 be deferred until the Court resolves the defendants' motion to dismiss the Securities Action.

24 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties to this  
25 action, through their counsel of record, as follows:

1           1.       Defendants' time to answer, move, or otherwise respond to the Amended Complaint  
2 is extended until after the Court resolves the defendants' motion to dismiss the Securities Action, as  
3 set forth in 2 below.

4           2.       Within twenty (20) days after the date of filing of the Court's Order on defendants'  
5 motion to dismiss the Securities Action, the parties will meet and confer regarding a schedule  
6 pursuant to which the Defendants will answer, move, or otherwise respond to the Amended  
7 Complaint.

8           3.       The parties reserve their right to renegotiate the terms of this Stipulation, or to  
9 otherwise request appropriate relief from the Court at any time.

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DATED: April 28, 2011

MORRISON & FOERSTER LLP  
JORDAN ETH  
JUDSON LOBDELL

s/ Judson Lobdell

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Judson Lobdell

Attorneys for Nominal Defendant Celera Corporation and Defendants Kathy Ordoñez, Joel R. Jung, Ugo DeBlasi, Richard A. Ayers, Jean-Luc Bélingard, William G. Green, Peter Barton Hutt, Gail K. Naughton, Wayne I. Roe, and Bennett M. Shapiro

DATED: April 28, 2011

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GEORGE C. AGUILAR  
JULIA M. WILLIAMS

s/George C. Aguilar

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GEORGE C. AGUILAR

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KELLY A. NOTO

Co-Lead Counsel for Plaintiffs

1 I, Judson E. Lobdell, am the ECF User whose ID and password are being used to file this  
2 Stipulation Extending Defendants' Time to Respond to Plaintiffs' Amended Consolidated Verified  
3 Shareholder Derivative Complaint Pursuant to Local Rule 6-1(A). In compliance with General  
4 Order No. 45, X.B., I hereby attest that George Aguilar has concurred in this filing.

5 /s/ Judson E. Lobdell  
6 JUDSON E. LOBDELL

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