

1 NINA F. LOCKER, State Bar No. 123838
 nlocker@wsgr.com
 2 STEVEN GUGGENHEIM, State Bar No. 201386
 sguggenheim@wsgr.com
 3 JONI OSTLER, State Bar No. 230009
 jostler@wsgr.com
 4 JESSICA L. SNORGRASS, State Bar No. 259962
 jsnorggrass@wsgr.com
 5 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation
 6 650 Page Mill Road
 Palo Alto, CA 94304-1050
 7 Telephone: (650) 493-9300
 Facsimile: (650) 565-5100

8
 9 Attorneys for Defendants Kevin Johnson,
 Scott Kriens, Pradeep Sindhu, Robert M. Calderoni,
 10 Mary B. Cranston, John Michael Lawrie,
 Stratton Sclavos, William R. Stensrud,
 William Meehan, David Schlotterbeck,
 11 Mercedes Johnson, Robyn M. Denholm, and Nominal
 Defendant Juniper Networks, Inc.

12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

)	Master File No. 11-CV-4792-LHK
)	
IN RE JUNIPER NETWORKS, INC.)	STIPULATION AND PROPOSED
SHAREHOLDER DERIVATIVE LITIGATION)	ORDER TEMPORARILY STAYING
)	ACTION
)	
)	
)	
)	

1 Having conferred pursuant to the Court's Order Proposing a Stay of Proceedings in
2 Consolidated Derivative Actions dated January 30, 2012, the parties hereby stipulate and agree,
3 and request that the Court order, as follows:

4 1. In the interests of efficiency, the above-captioned consolidated shareholder
5 derivative action should be and is hereby stayed until such time as an order is entered denying a
6 motion to dismiss in the related class action *City of Royal Oak Retirement System v. Juniper*
7 *Networks, Inc., et al.*, Case No. 11-CV-04003-LHK (the "Class Action");

8 2. The Defendants hereby withdraw their Motion to Proceed in One Forum without
9 prejudice to Defendants' rights to renew that motion or to seek a further stay in the event that an
10 order is entered denying a motion to dismiss in the Class Action and the plaintiffs in the
11 currently pending state derivative action captioned *In re Juniper Networks, Inc. Shareholder*
12 *Derivative Litigation*, Lead Case No. 111CV-207701, are prosecuting or seek to prosecute that
13 action;

14 3. Any party may, for good cause shown, move the Court to lift the stay at any time;

15 4. The current deadline to amend the complaint and the motion to dismiss briefing
16 schedule are vacated, and the Case Management Conference scheduled for March 22, 2012 is
17 hereby adjourned;

18 5. In the event that an order is entered denying a motion to dismiss in the Class
19 Action, the following schedule shall apply:

20 (a) Plaintiffs shall file their amended complaint within thirty days of the date
21 the Court issues an order denying in whole or in part a motion to dismiss the Class Action;

22 (b) Defendants shall file their motion(s) to dismiss the amended complaint
23 within thirty days thereafter;

24 (c) Plaintiffs shall file their opposition(s) to Defendants' motion(s) to dismiss
25 thirty days thereafter; and

26 (d) Defendants shall file their reply(ies) in support of their motion(s) to
27 dismiss within 21 days thereafter.

1 Dated: February 3, 2012

LEVI & KORSINKY, LLP

2

3

By: s/ Doug Julie
Doug Julie

4

Attorneys for Plaintiffs Olga Ratinova and Lisa E. Coppola, IRA

5

6

Dated: February 3, 2012

LAW OFFICES OF DAVID A. BAIN, LLC

7

8

By: s/ David A. Bain
David A. Bain

9

Attorneys for Plaintiff Lisa E. Coppola, IRA

10

11 Dated: February 3, 2012

BRAMSON, PLUTZIK, MAHLER &
BIRKHAUSER

12

By: s/ Alan R. Plutzik
Alan R. Plutzik

13

14

2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598
E-mail: aplutzik@bramsonplutzik.com

15

16

Attorneys for Plaintiffs Olga Ratinova and Lisa E. Coppola, IRA

17

18 Dated: February 3, 2012

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

19

20

By: s/ Joni Ostler
Joni Ostler

21

Attorneys for Nominal Defendant Juniper Networks, Inc. and Defendants Kevin Johnson, Scott Kriens, Pradeep Sindhu, Robert M. Calderoni, Mary B. Cranston, John Michael Lawrie, Stratton Sclavos, William R. Stensrud, William Meehan, David Schlotterbeck, Mercedes Johnson and Robyn M. Denholm

22

23

24

25

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

ORDER

The above stipulation having been considered, and good cause appearing therefore,
IT IS SO ORDERED. The Clerk shall administratively close the file.

DATED: February 6, 2012



THE HONORABLE LUCY H. KOH
United States District Judge