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15 Heywood Waga

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UNITED STATES DISTRICT COURT

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SOUTHERN DISTRICT OF CALIFORNIA

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21 IN RE PEREGRINE SYSTEMS, INC.
SECURITIES LITIGATION

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This Document Relates to:

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ALL ACTIONS.

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Case No. 02-CV-0870-BEN (RBB)

**LEAD PLAINTIFFS' JOINT NOTICE
OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF
PROPOSED SETTLEMENTS**

**NO HEARING DATE SET PER
INSTRUCTIONS OF THE COURT**

Judge: Honorable Roger T. Benitez

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

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PLEASE TAKE NOTICE that Section 10(b) Lead Plaintiff the Loran Group and

1 Section 11 Lead Plaintiff Heywood Waga will and do hereby move for preliminary approval of
2 proposed settlements of this action with the Settling Defendants, who were former outside
3 directors of Peregrine: John J. Moores, Charles E. Noell III, Norris van den Berg, Richard A.
4 Hosley II, Christopher A. Cole, and Rodney F. Dammeyer and the following defendants who
5 were former officers of Peregrine: Stephen P. Gardner, Matthew C. Gless, Frederic B. Luddy,
6 and Richard T. Nelson.

7 This motion is made on the ground that preliminary approval of the proposed settlements
8 is appropriate so that notice of the settlements can be provided to Class and Subclass members,
9 and a final settlement approval hearing scheduled.

10 This motion is based upon this notice of motion and motion; the Stipulation And
11 Agreement Of Settlement With Defendants John J. Moores, Charles E. Noell III, Norris van den
12 Berg, Richard A. Hosley II, Christopher A. Cole, and Rodney F. Dammeyer, dated as of August
13 8, 2008; the Stipulation And Agreement Of Settlement With Defendants Stephen P. Gardner,
14 Matthew C. Gless, Frederic B. Luddy and Richard T. Nelson, dated as of December 22, 2008; the
15 accompanying memorandum of points and authorities; and all pleadings, papers, and records on
16 file herein.

17 Dated: February 9, 2009

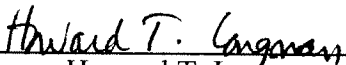
GOLD BENNETT CERA & SIDENER LLP

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19 By: 
20 Solomon B. Cera

21 Attorneys for Section 10(b) Lead Plaintiff
The Loran Group

22 Dated: February 9, 2009

STULL STULL & BRODY

23
24 By: 
Howard T. Longman *IS&*

25 Attorneys for Section 11 Lead Plaintiff
26 Heywood Waga

27 - and -
28

1 Dated: February ⁹__, 2009

ABRAHAM FRUCHTER & TWERSKY LLP

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3 By: Lawrence D. Levit (see
Lawrence D. Levit

4 Attorneys for Section 11 Lead Plaintiff
5 Heywood Waga
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