

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
POLICE AND FIRE RETIREMENT :
SYSTEM OF THE CITY OF DETROIT, :
PLYMOUTH COUNTY RETIREMENT :
SYSTEM, STATE-BOSTON RETIREMENT :
SYSTEM, and MICHAEL GOLDE, On Behalf :
of Themselves and All Others Similarly :
Situated, :
 :
Plaintiffs, :
 :
v. :
 :
SAFENET, INC., ANTHONY A. CAPUTO, :
KENNETH A. MUELLER, CAROLE D. :
ARGO, THOMAS A. BROOKS, IRA A. :
HUNT, JR., BRUCE R. THAW, ARTHUR L. :
MONEY, SHELLEY A. HARRISON, and :
ANDREW E. CLARK, :
 :
Defendants. :
----- X

Lead Case No. 06 Civ. 5797 (PAC)

**NOTICE OF DEFENDANT
KENNETH A. MUELLER'S
MOTION TO DISMISS
COUNTS I-IV**

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law in Support of Defendant Kenneth A. Mueller's Motion To Dismiss Counts I-IV, defendant Kenneth A. Mueller, by his undersigned counsel, moves this Court before the Honorable Paul A. Crotty for an order dismissing all counts against him in the Consolidated Amended Class Action Complaint For Violations Of The Federal Securities Laws Seeking Money Damages And Equitable Relief filed in the above-captioned matter.

Dated: October 1, 2008

Respectfully submitted,

/s/ Samuel B. Isaacson

Samuel B. Isaacson
DLA PIPER LLP (US)
203 N. LaSalle St., Suite 1900
Chicago, Illinois 60601-1293
Phone: (312) 368-4000
Facsimile: (312) 236-7516

Deborah R. Meshulam
DLA PIPER LLP (US)
500 Eighth Street, NW
Washington, DC 20004
Phone: (202) 799-4000
Facsimile: (202) 799-5000

Counsel for Defendant Kenneth A. Mueller

CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2008, I caused **Notice of Defendant Kenneth A. Mueller's Motion To Dismiss Counts I-IV and Memorandum of Law in Support of Kenneth A. Mueller's Motion To Dismiss Counts I-IV** to be filed electronically with the United States District Court for the Southern District of New York and served via overnight mail to:

Joel H. Bernstein
Labaton Sucharow LLP
140 Broadway
New York, NY 10005
Tel: 212.907.0700
Fax: 212.818.0477

Paul Adam Engelmayer
WilmerHale
399 Park Avenue
New York, NY 10022
Tel: 202.663.6000
Fax: 202.663.6363

William Curtis Fredericks
Bernstein Litowitz Berger & Grossmann LLP
1285 Avenue of the Americas
New York, NY 10019
Tel: 212.554.1400
Fax: 212.554.1444

Counsel for Carole D. Argo

Richard Howard Klapper
Sullivan and Cromwell LLP
125 Broad Street
New York, NY 10004
Tel: 212.558.4000
Fax: 212.558.3588

Counsel for Plaintiff Police and Fire Retirement System of the City of Detroit, Plymouth County Retirement System, State-Boston Retirement System and Michael J. Golde

Counsel for SafeNet, Inc., Andrew E. Clark and Shelley A. Harrison

John A. Freedman
Arnold & Porter LLP
555 Twelfth Street, N.W.
Washington, DC 20004-1206
Tel: 202.942.5000
Fax: 202.942.5999

Christian J. Mixter
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Tel: 202.739.5575
Fax: 202.739.3001

Counsel for Anthony A. Caputo

Counsel for Thomas A. Brooks, Ira A. Hunt, Jr., Bruce R. Thaw and Arthur L. Money

/s/ Joseph Collins