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11 *Attorneys for the Harel Group,*
12 *and Proposed Co-Lead Counsel*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 AMNON MEIR, On Behalf of Himself and
16 All Others Similarly Situated,
17 Plaintiffs,
18 v.
19 ALVARION LTD., ZVI SLONIMSKY,
20 DAFNA GRUBER and MEIR BAREL,
21 Defendants.

No. 3:07-cv-00374-JSW

STIPULATION RE
APPOINTMENT OF LEAD
PLAINTIFFS AND LEAD
COUNSEL; [PROPOSED]
ORDER

Hon. Jeffrey S. White

22
23 WHEREAS, on January 19, 2007, a class action complaint (Case No.
24 3:07-cv-00374-JSW), was filed with the United States District Court for the Northern
25 District of California by Amnon Meir, alleging violations of federal securities laws
26 in connection with purchases of Alvarion Ltd. common stock;

27 WHEREAS, on May 1, 2007, this Court issued an Order reassigning the related
28 action *Manfred Hacker v. Alvarion Ltd., et al.*, No. 07-cv-00719-JSW (filed in this

1 District Feb. 2, 2007) to this Court in this action (Docket No. 35);

2 WHEREAS, the related action *Paul Berger v. Alvarion Ltd., et al.*, No. 07-cv-
3 01007-SHS (filed in the Southern District of New York Feb. 13, 2007) was
4 transferred to this District on May 16, 2007, and is currently assigned to Magistrate
5 Judge Wayne D. Brazil (No. 07-cv-02601-WDB);

6 WHEREAS, the related action *Irving Braun v. Alvarion Ltd. et al.*, No. 07-cv-
7 20296-UA (filed in the Southern District of New York Mar. 12, 2007) was transferred
8 to this District on May 16, 2007, and is currently assigned to Magistrate Judge
9 Edward M. Chen (No. 07-cv-02602-EMC);

10 WHEREAS, on April 9, 2007, plaintiffs Harel Insurance Company Ltd. and
11 Furkan M. Khan (collectively, the "Harel Group"), pursuant to Section 21(D) of the
12 Private Securities Litigation Reform Act of 1995 ("PSLRA"), collectively filed a
13 motion for their appointment as Lead Plaintiff and approval of their choice of
14 counsel, Glancy Binkow & Goldberg LLP and The Law Office of Jacob Sabo as Co-
15 Lead Counsel in the case;

16 WHEREAS, on April 9, 2007, plaintiff Rahul Saraf, pursuant to Section 21(D)
17 of the Private Securities Litigation Reform Act of 1995 ("PSLRA"), filed a motion
18 for his appointment as Lead Plaintiff and approval of his choice of counsel, Federman
19 & Sherwood as Lead Counsel and Green Welling LLP as Liaison Counsel;

20 WHEREAS, on April 9, 2007, plaintiffs Irving Braun and Gary J. Fruchter
21 (collectively, the "Braun Group"), pursuant to Section 21(D) of the Private Securities
22 Litigation Reform Act of 1995 ("PSLRA"), collectively filed a motion for their
23 appointment as Lead Plaintiff and approval of their choice of counsel, Lerach
24 Coughlin Stoia Geller Rudman & Robbins LLP as Lead Counsel;

25 WHEREAS, no other putative class member has timely moved for appointment
26 as Lead Plaintiff in any of the above-mentioned related actions;

27 WHEREAS, pursuant to the PSLRA, the Court is to presume that the "most
28

1 adequate plaintiff” is the person or group of persons who, “in the determination of the
2 court has the largest financial interest in the relief sought by the class”;

3 WHEREAS, pursuant to the PSLRA, the Lead Plaintiff is vested with authority
4 to select and retain Lead Counsel, subject to court approval;

5 WHEREAS, Harel Insurance Company Ltd., Furkan M. Khan, and Rahul Saraf
6 have agreed to serve as Lead Plaintiffs;

7 WHEREAS, Harel Insurance Company Ltd., Furkan M. Khan, and Rahul Saraf
8 have collectively agreed to the selection of Glancy Binkow & Goldberg LLP, The
9 Law Office of Jacob Sabo, and Federman & Sherwood as Co-Lead Counsel;

10 WHEREAS, the Braun Group has indicated that it does not oppose
11 consolidating the above-mentioned related cases to the instant action;

12 WHEREAS, the Braun Group has indicated that it takes no position to the entry
13 of the accompanying [Proposed] Order regarding the appointment of Harel Insurance
14 Company Ltd., Furkan M. Khan, and Rahul Saraf as Lead Plaintiffs and the selection
15 of Glancy Binkow & Goldberg LLP, The Law Office of Jacob Sabo, and Federman
16 & Sherwood as Co-Lead Counsel;

17 WHEREAS, the initial case management conference is currently set for August
18 24, 2007; and

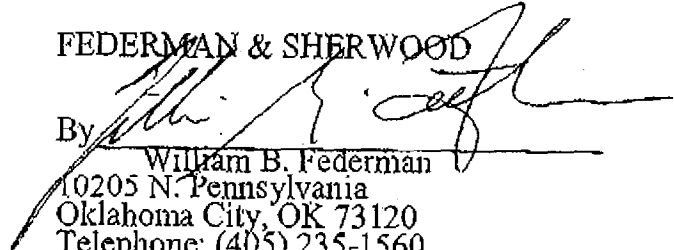
19 WHEREAS, the parties believe that it would be premature to discuss discovery
20 and other case management issues before a lead plaintiff and lead counsel is
21 appointed on behalf of the putative class and before such appointed lead plaintiff has
22 filed a consolidated amended complaint;

23 IT IS HEREBY STIPULATED AND AGREED, by the parties, through their
24 undersigned counsel, as follows:

25
26 1. The related actions *Paul Berger v. Alvarion Ltd., et al.*, No.
27 07-cv-02601-WDB (N.D. Cal.) and *Irving Braun v. Alvarion Ltd. et al.*, No.
28 07-cv-02602-EMC (N.D. Cal.) shall be consolidated under the above-captioned *Meir*

1 Dated August 13, 2007

FEDERMAN & SHERWOOD

By 
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Attorneys for Rahul Saraf and
Proposed Co-Lead Counsel

8 PURSUANT TO STIPULATION, IT IS SO ORDERED

10 Dated: August ____, 2007

HONORABLE JEFFREY S. WHITE
United States District Judge

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