

1 GLANCY BINKOW & GOLDBERG LLP
Lionel Z. Glancy, #134180
2 Andy Sohrn, # 241388
3 1801 Avenue of the Stars, Suite 311
Los Angeles, CA 90067
4 Telephone: (310)201-9150
5 Facsimile: (310)201-9160
E-mail: info@glancylaw.com

6

7 *Attorneys for Lead Plaintiffs*

8 *[Additional Counsel on Signature Page]*

9

UNITED STATES DISTRICT COURT

10

NORTHERN DISTRICT OF CALIFORNIA

11

SAN FRANCISCO DIVISION

12

13

Case No. 3:07-cv-00374-JSW

14

In re Alvarion Ltd. Securities Litigation

**STIPULATION FOR DISMISSAL AND
[PROPOSED] ORDER THEREON**

15

16

Hon. Jeffrey S. White

17

18

19

TO THIS HONORABLE COURT:

20

21

22

23

24

Lead Plaintiffs Furkan M. Khan and Rahul Saraf (collectively, "Lead Plaintiffs ") and
defendants Alvarion Ltd., Zvi Slonimsky, Dafna Gruber and Tzvika Friedman (collectively,
"Defendants "), hereby stipulate to the dismissal of this consolidated putative class action and
each complaint filed therein (the "Action ") on the terms set forth below.

25

26

1. The Action shall be dismissed in its entirety pursuant to Rule 41(a) of the Federal
Rules of Civil Procedure. Each side shall bear its own fees and costs.

27

28

2. Lead Plaintiffs agree that they will not assert, in this or any other Court, any claims or
causes of action, of any kind whatsoever, whether known or unknown, which Lead Plaintiffs

1 may now have or have ever had, against any named defendant or their counsel, relating to or
2 arising out of or in connection with any of the claims, facts, matters, omissions or occurrences
3 referred to in, or that could have been raised in, or which are the subject matters of, the Action.
4 Nothing herein, however, shall preclude either Lead Plaintiff from being an unnamed class
5 member in any future litigation in which it may be a member of the putative class, or from
6 participating on the same terms as any other unnamed class member in such action.

7 3. Each Defendant hereby releases any claims or causes of action, of any kind
8 whatsoever, whether known or unknown, suspected or unsuspected, anticipated or unanticipated,
9 which it may now have or have ever had, or hereafter can, shall or may have against Lead
10 Plaintiffs and their counsel relating to or arising out of or in connection with the filing and
11 prosecution of the Action.

12 4. This dismissal is without prejudice to the rights of any other purported member of the
13 putative class alleged in this Action.

14 **DATED:** January 23, 2008

GLANCY BINKOW & GOLDBERG LLP

15 By: /s/ Andy Sohrn
16 Andy Sohrn

17 Lionel Z. Glancy
18 1801 Avenue of the Stars, Suite 311
19 Los Angeles, California 90067
20 Telephone: (310) 201-9150
21 Facsimile: (310) 201-9160

22 Jacob Sabo
23 THE LAW OFFICE OF JACOB SABO
24 The Tower, No. 3 Daniel Frisch St.
25 15th Floor
26 Tel Aviv, Israel 64731
27 Telephone: 011 972 3 607 88 88
28 Facsimile: 011 972 3 607 88 89

