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11 COMPUTING CORPORATION

12 [Appearance Of Additional Counsel
13 Noted On Signature Page]

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA

16 ROSENBAUM CAPITAL, LLC,
17 Plaintiff,
18 v.
19 JOHN E. MCNULTY, TIM STEINKOPF AND
20 SECURE COMPUTING CORPORATION,
21 Defendants.

Case No.: 3:07-CV-0392 SC

**STIPULATION AND [PROPOSED]
ORDER RESCHEDULING INITIAL
CASE MANAGEMENT
CONFERENCE AND RELATED
DEADLINES**

The Honorable Samuel Conti

1 The parties to the above-entitled action, by and through their counsel of record,
2 hereby stipulate as follows:

3 **STIPULATION**

4 WHEREAS, the complaint in this action was filed on January 19, 2007;

5 WHEREAS, Plaintiff Rosenbaum Capital, LLC (“Plaintiff”) filed the Class Action
6 Amended Complaint (“Amended Complaint”) in this action on July 2, 2007;

7 WHEREAS, Defendants Secure Computing Corporation (“Secure”), John McNulty
8 and Timothy Steinkopf filed a motion to dismiss the Amended Complaint on August 16,
9 2007;

10 WHEREAS, on March 4, 2008, the Court issued an order denying the motion to
11 dismiss;

12 WHEREAS, “all discovery and other proceedings in this action were stayed during
13 the pendency of defendants’ motion to dismiss, pursuant to the Private Securities Litigation
14 Reform Act, 15 U.S.C. § 78u-4(b)(3)(B);

15 WHEREAS, pursuant to the Clerk’s Notice, the Initial Case Management
16 Conference in this action is scheduled for April 4, 2008, and therefore pursuant to Federal
17 Rule of Civil Procedure 26(f), the deadline for the parties to meet and confer is March 14,
18 2008, and the deadline to file a report under Rule 26(f) is March 28, 2008;

19 WHEREAS, Mary K. Budge, Senior Vice President and General Counsel to
20 defendant Secure, is unavailable and is expected to remain unavailable until some time
21 during the week of March 17, 2008 because she is attending trial in a patent action to which
22 Secure is a party, *Finjan Software Ltd. v. Secure Computing Corporation et al.*, United
23 States District Court for the District of Delaware Case No. 1:06-cv-00369-GMS. Ms.
24 Budge is the only in-house attorney at Secure and her participation is necessary to the
25 parties’ discussion of topics identified in Federal Rule of Civil Procedure 26(f) and this
26 Court’s March 1, 2007 Standing Order for All Judges Regarding the Contents of Joint Case
27 Management Statement, and to preparation of the parties’ Rule 26(f) report;

28 WHEREAS, the parties agree that a brief continuance of the Initial Case

1 Management Conference is in all parties' interests;

2 * * *

3 NOW THEREFORE, the parties respectfully request that the Court reschedule the
4 Case Management Conference set for April 4, 2008 to April 18, 2008. All other deadlines
5 under Federal Rule of Civil Procedure 26 shall be reset accordingly.

6 SO STIPULATED.

7 March 11, 2008

HELLER EHRMAN LLP

8 By /s/ Michael L. Charlson

9 MICHAEL L. CHARLSON

10 Attorneys for Defendants

11 March 11, 2008

FEDERMAN & SHERWOOD

12 By /s/ William B. Federman

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18 Lead Counsel for Plaintiffs

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Additional Counsel for Plaintiffs

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GENERAL ORDER 45 ATTESTATION

I, Michael L. Charlson, am the ECF User whose ID and password are being used to file this **STIPULATION AND [PROPOSED] ORDER RESCHEDULING INITIAL CASE MANAGEMENT CONFERENCE AND RELATED DEADLINES**. In compliance with General Order 45, X.B., I hereby attest that William B. Federman, Lead Counsel for Plaintiffs, have concurred in this filing.

Dated: March 10, 2008

By: /s/ Michael L. Charlson

Michael L. Charlson
HELLER EHRMAN LLP
Attorneys for Defendants JOHN E.
MCNULTY, TIM STEINKOPF and SECURE
COMPUTING CORPORATION

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[PROPOSED] ORDER

Having considered the stipulation of counsel and good cause appearing therefore, IT IS HEREBY ORDERED that the Case Management Conference set for April 4, 2008 is continued to April 18, 2008. All related deadlines under Federal Rule of Civil Procedure 26 are reset accordingly.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

THE HONORABLE SAMUEL CONTI
UNITED STATES DISTRICT COURT JUDGE