

1 MICHAEL L. CHARLSON (SBN 122125)
HELLER EHRMAN LLP
2 275 Middlefield Road
Menlo Park, California 94025-3506
3 Telephone: +1.650.324.7000
Facsimile: +1.650.324.0638
4 E-Mail: Michael.Charlson@hellerehrman.com

5 CAROL LYNN THOMPSON (SBN 148079)
NATHANIEL SPENCER-MORK (SBN 226886)
6 HELLER EHRMAN LLP
333 Bush Street
7 San Francisco, California 94104-2878
Telephone: +1.415.772.6000
8 Facsimile: +1.415.772.6268
E-Mail: CarolLynn.Thompson@hellerehrman.com
9 E-Mail: Nate.SpencerMork@hellerehrman.com

10 Attorneys for Defendants JOHN E. MCNULTY, TIM STEINKOPF and SECURE
COMPUTING CORPORATION

11
12 [Appearance Of Additional Counsel
Noted On Signature Page]

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15
16 ROSENBAUM CAPITAL, LLC,
17 Plaintiff,
18 v.
19 JOHN E. MCNULTY, TIM STEINKOPF AND
SECURE COMPUTING CORPORATION,
20 Defendants.
21

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

**SECOND STIPULATION
EXTENDING DEFENDANTS' TIME
TO ANSWER COMPLAINT**

Civ. L.R. 6-1(a)

The Honorable Samuel Conti

1 Pursuant to Civil Local Rule 6.1(a), the parties to the above-entitled action, by and
2 through their counsel of record, hereby stipulate as follows:

3 **STIPULATION**

4 WHEREAS, the initial 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, John McNulty and
8 Timothy Steinkopf (collectively, “Defendants”) filed a motion to dismiss the Complaint on
9 August 16, 2007;

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

12 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), Defendants’
13 answers to the Amended Complaint were due March 18, 2008;

14 WHEREAS, the parties previously stipulated to extend to April 18, 2008,
15 Defendants’ time to file answers to the Amended Complaint;

16 WHEREAS, the parties now agree that it is in their interest to extend Defendants’
17 time to file answers to the Amended Complaint;

18 WHEREAS, such an extension of time to answer will not alter the date of any event
19 or any deadline already fixed by Court order;

20 WHEREAS, pursuant to Civil Local Rule 6.1(a), no court order is required to give
21 effect to this Stipulation.

22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

* * *

NOW THEREFORE, the parties stipulate that Defendants' answers to the Amended Complaint shall be filed and served no later than April 25, 2008.

SO STIPULATED.

April 14, 2008

HELLER EHRMAN LLP

By /s/ Michael L. Charlson
MICHAEL L. CHARLSON

Attorneys for Defendants
JOHN E. MCNULTY, TIM STEINKOPF and
SECURE COMPUTING CORPORATION



1 April 14, 2008

FEDERMAN & SHERWOOD

2

By /s/ William B. Federman

3

William B. Federman
10205 N. Pennsylvania
Oklahoma City, OK 73120
Telephone: (405) 235-1560
Facsimile: (405) 239-2112

4

5

6

Lead Counsel for Plaintiffs

7

8

Robert S. Green
GREEN WELLING LLP
595 Market Street, Suite 2750
San Francisco, CA 94105
Telephone; (415) 477-6700
Facsimile: (415) 477-6710
Email: cand.uscourts@classcounsel.com

9

10

11

Liaison Counsel for Plaintiffs

12

13

Mark Henzel
LAW OFFICES OF MARK HENZEL
273 Montgomery Ave., Suite 202
Bala Cynwyd, PA 19004
Telephone: (610) 660-8000
Facsimile: (610) 660-8080

14

15

Additional Counsel for Plaintiffs

16

17

GENERAL ORDER 45 ATTESTATION

18

19

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.

20

21

22

23

Dated: April 14, 2008

By: /s/ Michael L. Charlson

24

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

25

26

27

28