



**GRANTED**

**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

POLICE AND FIRE RETIREMENT SYSTEM  
OF THE CITY OF DETROIT and GENERAL  
RETIREMENT SYSTEM OF THE CITY OF  
DETROIT, on behalf of themselves and all other  
similarly situated shareholders of Yahoo! Inc.,

Plaintiffs,

v.

Civil Action No. 3561

YAHOO! INC., JERRY YANG, ROY  
BOSTOCK, RON BURKLE, ERIC HIPPEAU,  
VYOMESH JOSHI, ARTHUR KERN, ROBERT  
KOTICK, EDWARD KOZEL, MAGGIE  
WILDEROTTER, AND GARY WILSON,

Defendants.

**STIPULATION AND PROPOSED CASE MANAGEMENT ORDER**

WHEREAS, on February 22, 2008, plaintiffs Police & Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit ("Plaintiffs") moved this Court for expedited discovery proceedings and requested that the Court set a trial date in May 2008;

WHEREAS, on February 25, 2008, Plaintiffs filed a Motion For Consolidation And Appointment of Lead Counsel;

WHEREAS, Plaintiffs served their first set of document requests upon defendants on February 26, 2008, and served their first set of interrogatories and second set of document requests upon defendants on February 27, 2008;

WHEREAS, the parties have conferred in good faith and have agreed to a schedule for proceedings in this matter, as set forth below;

NOW, THEREFORE, it is hereby stipulated and agreed, by and among the parties hereto as follows:

1. Plaintiffs will promptly seek a hearing date from the Court on their Motion For Consolidation And Appointment of Lead Counsel. Defendants do not oppose consolidation.

2. The parties shall agree on the terms of a stipulation and proposed order for the production and exchange of confidential information, and submit it to the Court as soon as practicable.

3. Defendants shall serve objections and responses to Plaintiffs' document requests on or before March 5, 2008.

4. Subject to Defendants' objections and responses, Defendants shall commence non-electronic document production, beginning with the production of available board materials and documents relating to the Severance Plans on or before March 7, 2008, and continuing on a rolling basis thereafter. Defendants will attempt to substantially complete non-electronic discovery by March 21, 2008. To the extent that the Court has not yet entered an order related to the production and exchange of confidential information before production commences, the parties agree to treat any documents that are produced on an outside "attorneys' eyes only" basis until such time as an order is entered;

5. Defendants shall answer plaintiffs' Verified Complaint by March 3, 2008;

6. Defendants shall answer plaintiffs' first set of interrogatories by March 14, 2008;

7. The parties agree to promptly negotiate a plan for the production of electronic documents, so as to permit such production to begin as soon as practicable on a

rolling basis. Plaintiffs agree to negotiate in good faith about ways to lessen the burdens of electronic discovery on the Defendants. Defendants will commence electronic document production on or before March 18, 2008, continuing on a rolling basis thereafter. Defendants will attempt to substantially complete electronic discovery by April 4, 2008;

8. Plaintiffs shall not seek to depose any of the defendants until at least March 31, 2008;

9. The parties shall negotiate in good faith to agree upon the scheduling of further proceedings, including the taking of any depositions, or any injunction hearing or trial;

10. Plaintiffs reserve all rights to seek additional expedited proceedings, including injunctive relief, as factual circumstances develop;

11. Defendants reserve all rights to oppose any request for expedited proceedings.

OF COUNSEL:

Mark Lebovitch  
Jonathan Harris  
Brett M. Middleton  
BERNSTEIN LITOWITZ BERGER  
& GROSSMANN LLP  
1285 Avenue of the Americas  
New York, New York 10019  
(212) 554-1400

/s/ Joel Friedlander  
Andre G. Bouchard (Bar No. 2514)  
David J. Margules (Bar No. 2254)  
Joel Friedlander (Bar No. 3163)  
Evan O. Williford (Bar No. 4162)  
BOUCHARD MARGULES &  
FRIEDLANDER, P.A.  
222 Delaware Avenue, Suite 1400  
Wilmington, Delaware 19801  
(302) 573-3500

*Counsel for Plaintiffs Police & Fire Retirement  
System of the City of Detroit and General  
Retirement System of the City of Detroit*

OF COUNSEL

James E. Lyons  
SKADDEN, ARPS, SLATE  
MEAGHER & FLOM LLP  
Four Embarcadero Center, Suite 3800  
San Francisco, California 94111  
(415) 984-6400

Garrett J. Waltzer  
SKADDEN, ARPS, SLATE  
MEAGHER & FLOM LLP  
525 University Avenue, Suite 1100  
Palo Alto, California 94301  
(650) 470-4500

OF COUNSEL

John W. Spiegel  
Robert L. Dell Angelo  
MUNGER TOLLES & OLSON LLP  
355 South Grand Avenue  
35th Floor  
Los Angeles, California 90071-1560  
Tel.: (213) 683-9100  
Fax: (213) 687-3702

*Attorneys for the Individual  
Defendants*

/s/ Edward P. Welch

Edward P. Welch, Esquire (Bar No. 671)  
Edward B. Micheletti, Esquire (Bar No. 3794)  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM  
One Rodney Square  
Wilmington, DE 19801  
(302) 651-3060

*Attorneys for Defendant  
Yahoo! Inc.*

/s/ David C. McBride

David C. McBride, Esquire (Bar No. 408)  
Bruce I. Silverstein, Esquire (Bar No. 2495)  
YOUNG CONAWAY STARGATT &  
TAYLOR  
The Brandywine Building  
1000 West Street  
Wilmington, DE 19801  
(302) 571-6639

*Attorneys for Jerry Yang, Roy Bostock, Ron  
Burkle, Eric Hippeau, Vyomesh Joshi, Arthur  
Kern, Robert Kotick, Edward Kozel, Maggie  
Wilderotter, and Gary Wilson*

IT IS HEREBY ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2008.

This document constitutes a ruling of the court and should be treated as such.

**Court:** DE Court of Chancery Civil Action

**Judge:** William B Chandler

**File & Serve**

**Transaction ID:** 18819127

**Current Date:** Mar 03, 2008

**Case Number:** 3561-CC

**Case Name:** Police & Fire Retirement System of Detroit vs Yahoo! Inc

---

/s/ **Judge William B Chandler**