1	Rachel Repka (CA Bar No. 248331) rachel.repka@snrdenton.com	KILPATRICK TOWNSEND & STOCKTON LLP Roger L. Cook (CA Bar No. 55208) Robert D. Todlock (CA Bar No. 238470)
2	Imran A. Khaliq (CA Bar No. 232607) imran.khaliq@snrdenton.com	Robert D. Tadlock (CA Bar No. 238479) Two Embarcadero Center Eighth Floor
3	SNR DENTON US LLP 1530 Page Mill Road, Suite 200	San Francisco, CA 94111 Telephone: (415) 576-0200
4	Palo Alto, CA 94304-1125 Telephone: (650) 798-0300	Facsimile: (415) 576-0300 Email: rcook@kilpatricktownsend.com
5	Facsimile: (650) 798-0310	tadlock@kilpatricktownsend.com
6	Mark L. Hogge ( <i>Pro Hac Vice</i> ) mark.hogge@snrdenton.com	Eric M. Hutchins (CA Bar No. 245462) 1080 Marsh Road
7	Shailendra K. Maheshwari (Pro Hac Vice)	Menlo Park, CA 94025
8	shailendra.maheshwari@snrdenton.com SNR DENTON US LLP	Telephone:         (650) 326-2400           Facsimile:         (650) 326-2422
9	1301 K Street, NW, Suite 600 Washington, DC 20004	Email: ehutchins@kilpatricktownsend.com
10	Telephone: (202) 408-6400 Facsimile: (202) 408-6399	Attorneys for Defendant SIDENSE CORP.
11	Attorneys for Plaintiff	
12	KILOPASS TECHNOLOGY, INC.	
13	UNITED STA	ATES DISTRICT COURT
14	FOR THE NORTHER	RN DISTRICT OF CALIFORNIA
15	SAN FRA	ANCISCO DIVISION
16	KILOPASS TECHNOLOGY, INC., a	Case No. 3:10-cv-02066 SI
17	California Corporation,	STIPULATED REQUEST FOR AN ORDER
18	Plaintiff, v.	EXTENDING DEADLINE TO FILE JOINT PRE-TRIAL STATEMENT
19	SIDENSE CORP., a Canadian	[Civil Local Rule 6-2]
20	Corporation,	
21	Defendant.	
22	SIDENSE CORP., a Canadian Corporation,	Case No. 3:11-cv-04112 SI
23	Plaintiff,	STIPULATED REQUEST FOR AN ORDER EXTENDING DEADLINE TO FILE JOINT
24	V.	PRE-TRIAL STATEMENT [Civil Local Rule 6-2]
25	KILOPASS TECHNOLOGY, INC., a California Corporation and CHARLIE	
26	CHENG, an individual,	
27	Defendants.	
28		
	STIPULATED REQUEST FOR AN ORDER EXTE DEADLINE TO FILE JOINT PRE-TRIAL STATEM	CASE NO. 3:10-cv-02066 SI; 3:11-cv-04112 SI MENT
		Dockets.Justia

1	Pursuant to Civil L.R. 6-2, Kilopass Technology, Inc. ("Kilopass") and Sidense Corporation
2	("Sidense") hereby file a stipulated request to extend the time by which Kilopass and Sidense shall
3	file the joint pre-trial statement which is currently due on August 28, 2011.
4	<b>STIPULATION</b>
5	WHEREAS, on September 27, 2011, the Court issued a Pre-Trial Order setting the pre-trial
6	conference date for September 11, 2012. (Dkt. No. 155)
7	WHEREAS, the Court's Pre-Trial Instructions require the parties to file the Pre-Trial
8	Statement fourteen days before the pre-trial conference, which falls on August 28, 2012. (Dkt. No.
9	155)
10	WHEREAS, on August 16, 2012 the Court issued two summary judgment orders narrowing
11	the issues for trial. (See Dkt. Nos. 272 (Kilopass v. Sidense) and 99 (Sidense v. Kilopass))
12	WHEREAS, the Court's summary judgment orders affect the parties' pre-trial preparation,
13	witness lists, exhibits, jury instructions, deposition designations and other matters required for the
14	Court's Pre-Trial Statement.
15	WHEREAS, the parties have agreed that additional time to prepare the Pre-Trial Statement
16	would allow the parties to effectively narrow the issues for trial and prepare a Pre-Trial Statement in
17	accordance with the Court's orders.
18	ACCORDINGLY, Kilopass and Sidense hereby stipulate to request an extension of time to
19	August 31, 2012 to file the Pre-Trial Statement, Verdict Form, Voir Dire Questions and Joint Jury
20	Instructions. The parties will file any motions in <i>limine</i> on August 28, 2012 as required in the
21	Court's Pre-Trial Order
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28	- 2 -
	STIPULATED REQUEST FOR AN ORDER EXTENDING DEADLINE TO FILE JOINT PRE-TRIAL STATEMENTCASE NO. 3:10-cv-02066 SI; 3:11-cv-04112 SI

1	IT IS SO STIPULATED, THROUGH COU	JNSEL OF RECORD:
2	Dated: August 23, 2012	Respectfully submitted,
3		SNR DENTON US LLP
4		/s/ Imran A. Khaliq Imran A. Khaliq (State Bar No. 232607)
5		Attorneys for Plaintiff KILOPASS TECHNOLOGY, INC.
6		
7	Dated: August 23, 2012	Respectfully submitted, KILPATRICK TOWNSEND & STOCKTON LLP
8		
9		<u>/s/ Roger Cook</u> Roger Cook
10		Attorneys for Defendant SIDENSE CORP.
11		
12		
13	IT IS SO ORDERED.	
14		
15	Dated: 8/23 , 2012	By: Susan Delaton
16		Hon. Susan Illston United States District Court Judge
17		Office States District Court Judge
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	STIPULATED REQUEST FOR AN ORDER EXT DEADLINE TO FILE JOINT PRE-TRIAL STATE	- 3 - ENDING CASE NO. 3:10-cv-02066 SI; 3:11-cv-04112 SI MENT

<b>CERTIFICATION PURSUANT TO GENERAL RULE NO. 45, SECTION</b>	NX,
<b>RE E-FILING ON BEHALF OF MULTIPLE SIGNATORIES</b>	

1	<u>CERTIFICATION PURSUANT TO GENERAL RULE NO. 45, SECTION X,</u> <u>RE E-FILING ON BEHALF OF MULTIPLE SIGNATORIES</u>
2	
3	In accord with the Northern District of California's General Order No. 45, Section X.(B), I
4	attest that concurrence in the filing of this document has been obtained from each of other
5	signatories who are listed on the signature pages.
6	Pursuant to General Rule No. 45, I shall maintain records to support this concurrence for
7	subsequent production for the Court if so ordered, or for inspection upon request by a party until one
8	year after final resolution of the action (including appeal, if any).
9	Executed on August 23, 2012 at Palo Alto, California.
10	
11	SNR DENTON US LLP
12	/s/ Imran A. Khaliq
13	Imran A. Khaliq (State Bar No. 232607) Attorneys for Plaintiff
14	KILOPASS TECHNOLOGY, INC.
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	STIPULATED REQUEST FOR AN ORDER EXTENDING DEADLINE TO FILE JOINT PRE-TRIAL STATEMENT       CASE NO. 3:10-cv-02066 SI; 3:11-cv-04112 SI

1	CERTIFICATE OF SERVICE
2	I, Jocasta Wong, hereby declare:
3	I am employed in the City and County of Palo Alto, California in the office of a member of
4	the bar of this court whose direction the following service was made. I am over the age of eighteen
5	years and not a party to the within action. My business address is SNR Denton US LLP, 1530 Page
6	Mill Road, Suite 200, Palo Alto, California 94304.
7	On August 23, 2012, the following document, described as:
8 9	STIPULATED REQUEST FOR AN ORDER EXTENDING DEADLINE FOR PRE-TRIAL STATEMENT
10	to be served via CM/ECF by the Clerk of the Court, upon all counsel of record registered to receive
11	electronic filing, as indicated on the Court's website, or by United States Mail, upon those parties
12	not registered for electronic filing.
13	I declare under penalty of perjury that the above is true and correct. Executed on
14	August 23, 2012, in Palo Alto, California.
15	
15 16	/s/ Jocasta Wong
	/s/ Jocasta Wong Jocasta Wong
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1 2 3 4 5	Rachel Repka (CA Bar No. 248331) rachel.repka@snrdenton.com Imran A. Khaliq (CA Bar No. 232607) imran.khaliq@snrdenton.com <b>SNR DENTON US LLP</b> 1530 Page Mill Road, Suite 200 Palo Alto, CA 94304-1125 Telephone: (650) 798-0300 Facsimile: (650) 798-0310	KILPATRICK TOWNSEND & STOCKTON LLP Roger L. Cook (CA Bar No. 55208) Robert D. Tadlock (CA Bar No. 238479) Two Embarcadero Center Eighth Floor San Francisco, CA 94111 Telephone: (415) 576-0200 Facsimile: (415) 576-0300 Email: rcook@kilpatricktownsend.com tadlock@kilpatricktownsend.com
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7	mark.hogge@snrdenton.com Shailendra K. Maheshwari ( <i>Pro Hac Vice</i> )	1080 Marsh Road Menlo Park, CA 94025
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9	1301 K Street, NW, Suite 600 Washington, DC 20004	Email: ehutchins@kilpatricktownsend.com
10	Telephone: (202) 408-6400 Facsimile: (202) 408-6399	Attorneys for Defendant SIDENSE CORP.
11	Attorneys for Plaintiff	
12	KILOPASS TECHNOLOGY, INC.	
13	UNITED STA	ATES DISTRICT COURT
14	FOR THE NORTHE	RN DISTRICT OF CALIFORNIA
15	SAN FRA	ANCISCO DIVISION
16	KILOPASS TECHNOLOGY, INC., a	Case No. 3:10-cv-02066 SI
17	California Corporation, Plaintiff,	DECLARATION OF IMRAN KHALIQ ISO STIPULATED REQUEST FOR AN ORDER
18	V.	EXTENDING DEADLINE TO FILE JOINT PRE-TRIAL STATEMENT
19	SIDENSE CORP., a Canadian	[Civil Local Rule 6-2]
20	Corporation,	
21	Defendant.	
22	SIDENSE CORP., a Canadian	Case No. 3:11-cv-04112 SI
23	Corporation,	DECLARATION OF IMRAN KHALIQ ISO
24	Plaintiff, v.	STIPULATED REQUEST FOR AN ORDER EXTENDING DEADLINE TO FILE JOINT DDE TRIAL STATEMENT
25	KILOPASS TECHNOLOGY, INC., a	PRE-TRIAL STATEMENT [Civil Local Rule 6-2]
26	California Corporation and CHARLIE CHENG, an individual,	
27	Defendants.	
28	KHALIQ'S DECL. ISO STIPULATED REQUEST	FOR AN CASE NO. 3:10-cv-02066 SI; 3:11-cv-04112 SI
	ORDER EXTENDING DEADLINE FOR PRE-TRI	

I,	Imran	Khaliq,	decl	are:
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1. I am an attorney in the law firm of SNR Denton US LLP, counsel of record for Plaintiff Kilopass Technology, Inc. ("Kilopass") in the above-captioned action. I make this declaration based on my own personal knowledge and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.

2. I have conferred with counsel for Sidense Corporation and have discussed a stipulated request for an extension of time to complete the parties' Pre-Trial Statement and pre-trial disclosures currently due on August 28, 2012.

3. Counsel for both parties agree that it will be require additional time to compile the Pre-Trial Statement and request an extension of time until August 31, 2012 to file the Pre-Trial Statement and other pre-trial disclosures required by the Court.

4. Previous time modifications in this case by party stipulation or Court order include:

- Stipulation to extend Sidense's date to Answer Complaint from July 9, 2010 to July 31, 2010. (Dkt. No. 11).
- Order changing time on hearing Sidense's Motion to Dismiss from September 1, 2010 to September 10, 2010. (Dkt. No. 20).
- Order granting counsels request to extend deadline to file Joint Claim Construction Statement to May 6, 2011. (Dkt. No. 100).
- Order granting extension for third party discovery to January 31, 2012. (Dkt. No. 174)

Order granting extension to complete mediation by February 29, 2012.

5. The requested extension for time will not have an effect on any other date or deadline in this case.

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1	SNR DENTON US LLP	
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3	Imran A. Khaliq (State Bar No. 232607)	
4	<i>Attorneys for Plaintiff</i>	
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28	28 KHALIQ'S DECL. ISO STIPULATED REQUEST FOR AN CASE NO. 3:10-cv-02066 SI; 3 ORDER EXTENDING DEADLINE FOR PRE-TRIAL STATEMENT	:11-cv-04112 SI

1	CERTIFICATE OF SERVICE
2	I, Jocasta Wong, hereby declare:
3	I am employed in the City and County of Palo Alto, California in the office of a member of
4	the bar of this court whose direction the following service was made. I am over the age of eighteen
5	years and not a party to the within action. My business address is SNR Denton US LLP, 1530 Page
6	Mill Road, Suite 200, Palo Alto, California 94304.
7	On August 23, 2012, the following documents, described as:
8	DECLARATION OF IMRAN KHALIQ ISO STIPULATED REQUEST
9	FOR AN ORDER EXTENDING DEADLINE TO FILE JOINT PRE-TRIAL STATEMENT [Civil Local Rule 6-2]
10	to be served via CM/ECF by the Clerk of the Court, upon all counsel of record registered to receive
11	electronic filing, as indicated on the Court's website, or by United States Mail, upon those parties
12	not registered for electronic filing.
13	I declare under penalty of perjury that the above is true and correct. Executed on
14	August 23, 2012, in Palo Alto, California.
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15 16	/s/ Jocasta Wong Jocasta Wong
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