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9 Attorneys for Plaintiff and Counterdefendant  
 Technology Licensing Corporation

10  
 11 IN THE UNITED STATES DISTRICT COURT  
 FOR THE EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION

13 TECHNOLOGY LICENSING  
 CORPORATION,

14 Plaintiff,

15 v.

16 THOMSON, INC.,

17 Defendant.

Case No. CIV S-03-1329 WBS PAN

**STIPULATED REQUEST AND  
 [PROPOSED] ORDER PERMITTING  
 TECHNOLOGY LICENSING  
 CORPORATION TO FILE ITS  
 SECOND AMENDED COMPLAINT**

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 19 The parties hereto, through their respective counsel of record, hereby submit this  
 20 stipulated request that TLC be permitted to file its Second Amended Complaint. As TLC  
 21 explained in the Parties Joint Status Report (Dkt. No. 226 at p. 2), the originally asserted patents  
 22 in this litigation, U.S. Patent Nos. 5,754,250 and 5,486,869, and were reissued by the United  
 23 States Patent and Trademark Office as United States Patent Nos. RE 40,411 and RE 40,412,

24 Stipulated Request and [Proposed] Order Permitting  
 Technology Licensing Corporation to File Its Second  
 Amended Complaint

1 respectively. TLC thereby seeks to file its Second Amended Complaint in order to substitute the  
2 reissue patents for the originally asserted patents, to remove AV Technologies as a party, and to  
3 assert infringement by Thomson of one or more of the additional claims from each of the '411  
4 and '412 reissue patents.

5 Good cause exists for TLC to file its Second Amended Complaint, as Thomson has  
6 consented (without waiving any objections or defenses) to TLC's filing its Second Amended  
7 Complaint pursuant to Fed.R.Civ.Proc. 15(a)(2). This filing will not impact any deadlines in the  
8 scheduling order (Dkt. No. 229). Pursuant to L.R. 5-137(c), TLC's Second Amended  
9 Complaint is attached as Exhibit 1.

10 Dated: January 15, 2010

**NIRO SCAVONE HALLER & NIRO**

11 By: /S/ Kara L. Szpondowski  
12 Raymond P. Niro  
13 Joseph N. Hosteny  
14 Arthur A. Gasey  
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Audrey A. Millemann  
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Attorneys for Plaintiffs

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19 Dated: January 15, 2010

**DUANE MORRIS LLP**

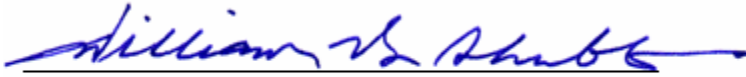
20 By: /S/  
21 Richard T. Redano  
22 Gary R. Maze  
23 Christina C. Marshall

Attorneys for Defendant

1 **ORDER**

2 IT IS HEREBY ordered that Technology Licensing Corporation may file its Second  
3 Amended Complaint.

4 Dated: January 19, 2010

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6 WILLIAM B. SHUBB  
7 UNITED STATES DISTRICT JUDGE  
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