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Attorneys for Defendant and Counterclaimant
NORDDEUTSCHE SEEKABELWERKE GMBH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SCHILLING ROBOTICS, LLC,
Plaintiff,

vs.

NORDDEUTSCHE SEEKABELWERKE
GMBH, et. al.,
Defendants.

Case No. 2:11-cv-00311-FCD-GGH

Complaint Filed: November 30, 2010

**STIPULATION AND ORDER TO EXTEND
THE JOINT STATUS REPORT FILING
DATE TO APRIL 15, 2011**

AND RELATED COUNTERCLAIM.

1 WHEREAS, on February 2, 2011, this case was timely removed by Norddeutsche
2 Seekabelwerke GMBH (“NSW”) to the United States District Court, Eastern District of
3 California;

4 WHEREAS, on or about February 3, 2011, the Court issued an Order Requiring Joint
5 Status Report to be filed within sixty (60) days from the date of removal, which is April 4, 2011;

6 WHEREAS, NSW and Schilling Robotics, LLC (“Schilling”) (collectively, the “Parties”)
7 are in the process of conferring, as required by Federal Rules of Civil Procedure Rule 26(f), and
8 preparing the Joint Status Report;

9 WHEREAS, the mother of lead counsel for NSW, Matthew Siembieda, recently passed
10 away, and Mr. Siembieda will have a very limited ability to participate in further conferring and
11 preparing of the Joint Status Report prior to the original filing deadline;

12 WHEREAS, the lead counsel for Schilling, Matthew Covington, will be unavailable from
13 April 2, 2011 through April 10, 2011;

14 WHEREAS, no dates for a status conference, or any other proceedings, have yet been set
15 by the Court;

16 WHEREAS, the Parties have shown good cause under Federal Rules of Civil Procedure
17 16(b)(4) to modify the Order Requiring Joint Status Report, and therefore respectfully request the
18 Court to enter the Proposed Order to this Stipulation;

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1 **STIPULATION**

2 IT IS HEREBY STIPULATED by and between the Parties hereto, through their
3 respective attorneys of record, that the Parties will file their Joint Status Report by April 15, 2011.
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5 Dated: March 29, 2011

DLA PIPER US LLP

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8 By: /s/ Matthew S. Covington
Matthew S. Covington
9 Attorneys for Plaintiff and
Counterdefendant SCHILLING
10 ROBOTICS, LLC
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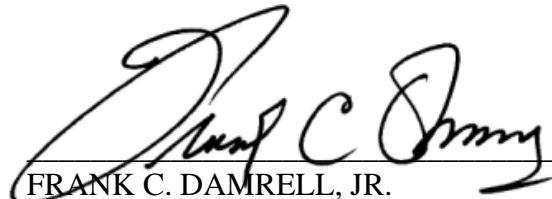
12 Dated: March 29, 2011

MORGAN, LEWIS & BOCKIUS LLP

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15 By: /s/ Howard Holderness
Howard Holderness
16 Attorneys for Defendant and
Counterclaimant
17 NORDDEUTSCHE SEEKABELWERKE
18 GMBH
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20 **IT IS SO ORDERED.**

21
22 Dated: March 30, 2011

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FRANK C. DAMRELL, JR.
24 UNITED STATES DISTRICT JUDGE
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