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22 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  <b>STIPULATION AND ORDER TO EXTEND THE JOINT STATUS REPORT FILING DATE TO APRIL 15, 2011</b>
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## 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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## **STIPULATION**

IT IS HEREBY STIPULATED by and between the Parties hereto, through their respective attorneys of record, that the Parties will file their Joint Status Report by April 15, 2011.

Dated: March 29, 2011

DLA PIPER US LLP

By: /s/ Matthew S. Covington  
Matthew S. Covington  
Attorneys for Plaintiff and  
Counterdefendant SCHILLING  
ROBOTICS, LLC

Dated: March 29, 2011

## MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Howard Holderness  
Howard Holderness  
Attorneys for Defendant and  
Counterclaimant  
NORDDEUTSCHE SEEKABELWERKE  
GMBH

## IT IS SO ORDERED.

Dated: March 30, 2011

  
FRANK C. DAMRELL, JR.  
UNITED STATES DISTRICT JUDGE