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 Counterclaimants Samsung Electronics
 Co., Ltd., et al.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA

20 ADVANCED MICRO DEVICES, INC.,
 et al.,
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 Plaintiffs,
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 v.
 23
 SAMSUNG ELECTRONICS CO., LTD.,
 et al.,
 24
 Defendants.
 25

Case. No. CV-08-0986-SI

**STIPULATION AND [PROPOSED]
 ORDER REQUESTING TO EXTEND THE
 DEADLINES TO FILE CERTAIN
 MOTIONS TO COMPEL IF THE PARTIES
 CANNOT REACH AGREEMENT ON THE
 SPECIFIED DISPUTES**

[Civil L.R. 7-12]

1 Advanced Micro Devices, Inc. and ATI Technologies, ULC (collectively, “AMD”), and
2 Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Austin Semiconductor,
3 LLC, Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, and
4 Samsung Digital Imaging Co., Ltd. (collectively, “Samsung”) jointly submit this Stipulation
5 regarding the request to extend the deadline to file motions to compel regarding specified
6 discovery disputes.

7 WHEREAS, the parties agree that there is still room for more negotiation which may
8 obviate the need to engage in motions practice with regard to discovery issues concerning U.S.
9 Patent No. 5,740,065 (“’065 patent”). Therefore, the parties jointly stipulate to request to extend
10 the deadline to file discovery-related motions to compel solely with respect to the following
11 discovery requests: Samsung’s Interrogatory 98, Samsung’s related 30(b)(6) deposition request
12 Topic 31 served February 5, 2010, AMD’s Request for Production 276, AMD’s Interrogatories
13 58-60 and AMD’s related 30(b)(6) deposition request Topic 323 served January 5, 2010.

14 WHEREAS, the parties agree that there is still room for more negotiation which may
15 obviate the need to engage in motions practice with regard to the production of additional AMD
16 sales data. Therefore, the parties jointly stipulate to request to extend the deadline to file
17 discovery-related motions to compel solely with respect to the production of additional AMD
18 sales data.

19 WHEREAS, the parties have scheduled a telephonic meet-and-confer to be held on
20 Sunday, March 28, 2010, during which the parties will attempt to resolve the issues set forth
21 above.

22 Pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by
23 and between AMD and Samsung that, subject to the Court’s approval, the deadline for filing
24 motions to compel with respect to the issues set forth above shall be extended by five (5) days
25 (until March 31, 2010). The parties further agree that this stipulation will in no way lengthen the
26 period of time in which to serve discovery. With regard to discovery issues relating to the ’065
27 patent, the parties further agree that this stipulation will not change or serve as the basis for
28 changing any other deadline in the case, particularly the deadlines for serving expert reports.

1 With regard to AMD sales data issues, AMD will continue to contest any extension to the expert
2 report due date.

3
4 DATED: March 26, 2010

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

5 By: /s/Cole M. Fauver

6 William H. Manning

7 Cole M. Fauver

8 Logan J. Drew

9 **ATTORNEYS FOR ADVANCED MICRO
10 DEVICES, INC. AND ATI TECHNOLOGIES,
11 ULC**

12
13 DATED: March 26, 2010

COVINGTON & BURLING LLP

14 By: /s/Christine Saunders Haskett

15 Christine Saunders Haskett

16 Alexa Hansen

17 **ATTORNEYS FOR SAMSUNG
18 ELECTRONICS CO., LTD.; SAMSUNG
19 SEMICONDUCTOR, INC.; SAMSUNG
20 AUSTIN SEMICONDUCTOR, LLC; SAMSUNG
ELECTRONICS AMERICA, INC.; SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC;
SAMSUNG DIGITAL IMAGING CO., LTD.**

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22
23 _____, 2010



24 _____
25 Honorable Susan Illston
26 United States District Judge

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ECF CERTIFICATION

I, Logan J. Drew, am the ECF User whose identification and password are being used to file this Stipulation regarding requesting to extend deadlines to file motions to compel on specific items of discovery. I hereby attest that Christine S. Haskett has concurred in this filing.

DATED: March 26, 2010

**ROBINS, KAPLAN, MILLER & CIRESI
L.L.P.**

By /s/Logan J. Drew

LOGAN J. DREW

Attorneys for Plaintiffs and Counter-defendants
Advanced Micro Devices, Inc., et al.