

1 William H. Manning (*pro hac vice*)  
 2 E-mail: WHManning@rkmc.com  
 3 Brad P. Engdahl (*pro hac vice*)  
 4 E-mail: BPEngdahl@rkmc.com  
 5 **Robins, Kaplan, Miller & Ciresi L.L.P.**  
 6 2800 LaSalle Plaza  
 7 800 LaSalle Avenue  
 8 Minneapolis, MN 55402  
 9 Telephone: 612-349-8500  
 10 Facsimile: 612-339-4181

11 Attorneys for Plaintiffs and  
 12 Counterdefendants Advanced Micro  
 13 Devices, Inc., et al.

Robert T. Haslam (Bar No. 71134)  
 E-mail: Rhaslam@cov.com  
**Covington & Burling L.L.P.**  
 333 Twin Dolphin Drive, Suite 700  
 Redwood Shores, CA 94065  
 Telephone: 650-632-4700  
 Facsimile: 650-632-4800

Alan H. Blankenheimer (Bar No. 006164)  
 E-mail: Ablankenheimer@cov.com  
**Covington & Burling L.L.P.**  
 9191 Towne Centre Drive, Suite 600  
 San Diego, CA 92122  
 Telephone: 858-658-1800  
 Facsimile: 858-678-1600

Attorneys for Defendants and Counterclaimants  
 Samsung Electronics Co., Ltd., et al.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

14 ADVANCED MICRO DEVICES, INC., et  
 15 al.,

16 Plaintiffs,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., et  
 19 al.,

20 Defendants.

Case. No. CV-08-0986-SI

**STIPULATION REGARDING CLAIM  
 CONSTRUCTION DEADLINES**

21 Advanced Micro Devices, Inc. and ATI Technologies, ULC (collectively “AMD”), and  
 22 Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Austin Semiconductor,  
 23 LLC; Samsung Electronics America, Inc.; Samsung Telecommunications America, LLP; Samsung  
 24 Techwin Co., Ltd.; and Samsung Opto-Electronics America, Inc. (collectively “Samsung”) jointly  
 25 submit this Stipulation regarding deadlines for claim construction.

26 WHEREAS, pursuant to this Court’s Case Management Order (Dkt. #57), the parties will  
 27 submit a Joint Claim Construction and Prehearing Statement on January 13, 2009.

WHEREAS, Patent Local Rule 4-4 instructs that claim construction discovery will close on February 12, 2009, 30 days after submission of the parties' Joint Statement.

WHEREAS, Patent Local Rule 4-5(a) instructs that the parties will file and serve opening claim construction briefs on February 27, 2009, 45 days after submission of the parties' Joint Statement.

WHEREAS, the Court's Case Management Order tentatively sets February 27, 2009 as the date for completing claim construction discovery (Dkt. #57).

WHEREAS the Court's Case Management Order tentatively sets March 16, 2009 as the date for filing and serving opening claim construction briefs (Dkt. #57).

WHEREAS, the chart below sets forth the relevant deadlines as determined by the Patent Local Rules, and as tentatively set by the Case Management Order:

DESCRIPTION	DATE SET BY PATENT LOCAL RULES	DATE TENTATIVELY SET IN CASE MANAGEMENT ORDER (DKT. #57)
Completion of Claim Construction Discovery	February 12, 2009	February 27, 2009
Claim Construction Briefs	February 27, 2009	March 16, 2009

WHEREAS the parties agree that additional time for claim construction is both necessary and desirable.

WHEREAS, the parties wish to enter a joint stipulation converting the tentatively set deadlines to firm deadlines.

Now, therefore, pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by and between AMD and Samsung that:

1. The parties shall complete all discovery relating to claim construction, including any depositions with respect to claim construction of any witnesses, including experts, identified in the Joint Claim Construction and Prehearing Statement, by February 27, 2009;

2. Each party claiming patent infringement shall serve and file an opening brief and any evidence supporting it claim construction, as to the claim terms and/or elements found in patents it has asserted, on March 16, 2009; and

3. All subsequent deadlines relating to claim construction shall occur in accordance with the Patent Local Rules of the United States District Court for the Northern District of California as modified by this Stipulation, unless otherwise stipulated to by the parties or ordered by the Court.

DATED: December 29, 2008

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

By: /s/ William H. Manning

William H. Manning

Brad P. Engdahl

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

DATED: December 29, 2008

**COVINGTON & BURLING L.L.P.**

By: /s/ Alan Blankenheimer

Robert T. Haslam

Alan Blankenheimer

Tutorial : 4/7/09 @ 3:30 p.m.

Markman : 4/8/09 @ 3:30 p.m.

**ATTORNEYS FOR SAMSUNG ELECTRONICS  
CO., LTD.; SAMSUNG SEMICONDUCTOR,  
INC.; SAMSUNG AUSTIN SEMICONDUCTOR,  
LLC; SAMSUNG ELECTRONICS AMERICA,  
INC.; SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC; SAMSUNG TECHWIN CO.,  
LTD.; AND SAMSUNG OPTO-ELECTRONICS  
AMERICA, INC.**

*Plaintiffs' counsel attests that concurrence in the  
filing of this document has been obtained from the  
above-named signatory.*

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

December \_\_, 2008



Honorable Susan Illston

United States District Judge