Trans Video Electronics, Ltd. v. Sony Electronics Inc. et al

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| Pursuant to Civil L.R. 6-2, the parties hereby stipulate, by and through their respective |
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| undersigned counsel of record, that Plaintiff and Counter-Defendant Trans Video Electronics, Ltd. |
| ("Trans Video") shall have a 14-day extension of time to respond to the Counterclaims of |
| Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony Corporation Of America, Sony |
| Computer Entertainment America Inc., in this action, to and including October 28, 2009. |
| Trans Video has not previously sought or received any enlargements of time to respond to the |
| Counterclaims. This stipulation for a 14-day extension of time is not believed to have an effect on |
| the schedule for the case. The accompanying Declaration of Matthew K. Blackburn provides the |
| information required by Civil L.R. 6-2(a)(1)-(3), as well as the attestation required by Section X(B) |
| of the General Order 45. |

Dated: October 14, 2009 LOCKE LORD BISSELL & LIDDELL LLP

> By: /s/ Matthew K. Blackburn Matthew K. Blackburn (CSB No. 261959) mblackburn@lockelord.com 44 Montgomery Street, Suite 2550 San Francisco, CA 94104 Telephone No.: (415) 318-8810 Facsimile No.: (415) 676-5816

> > John F. Sweeney (pro hac vice) jsweeney@lockelord.com Zachary D. Silbersher (pro hac vice) zsilbersher@lockelord.com LOCKE, LORD, BISSELL & LIDDELL, LLP 3 World Financial Center New York, NY 10281-2101 Telephone No.: (212) 415-8600

Facsimile No.: (212) 415-8601

ATTORNEYS FOR PLAINTIFF AND COUNTER-DEFENDANT TRANS VIDEO ELECTRONICS, LTD.

Dated: October 14, 2009 KENYON & KENYON LLP

> STIPULATION & [PROPOSED] ORDER -2-ENLARGING TIME FOR TRANS VIDEO TO RESPOND TO THE U.S. SONY COUNTERCLAIMS

> > Case No. 09 CV 03304 MHP

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| | 2 | By: /s/ with permission |
| | 3 | Megan Whyman Olesek molesek@kenyon.com |
| | 4 | 333 W. San Carlos St., San Jose, CA 95110 |
| | 5 | Telephone No.: (408) 9 |
| | | Facsimile No.: (408) 97 |
| | 6 | Of Counsel: |
| | 7 | John Flock (pro hac vice jflock@kenyon.com |
| | 8 | Walter E. Hanley, Jr. (p. |
| | 9 | whanley@kenyon.com KENYON & KENYON |
| | 10 | One Broadway New York, NY 10004 |
| | 11 | Telephone No.: (212) 4 |
| | 12 | Facsimile No.: (212) 42 |
| 104 | 13 | Brett N. Watkins, Esq. (pr |
| San Francisco, CA 94104 | 14 | bwatkins@kenyon.com KENYON & KENYON L |
| sco, C | 15 | 1500 K Street, NW Washington, DC 20005-12 |
| ranci | | Telephone No.: (202) 22 |
| San F | 16 | Facsimile No.: (202) 22 |
| | 17 | Attorneys For Defendants At Plaintiffs Sony Electronics I |
| | 18 | Corporation Of America, Son |
| | 19 | Entertainment America Inc., S Entertainment Inc., and Sony |
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ND COUNTER-INC., SONY VY COMPUTER SONY COMPUTER **CORPORATION**

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CERTIFICATE OF SERVICE

I, Matthew K. Blackburn, am employed in the City and County of San Francisco, California. I am over the age of eighteen years, and am not a party to the within action. My business address is Locke Lord Bissell & Liddell, 44 Montgomery Street, Suite 2550, San Francisco, CA 94104. On October ___, 2009, I caused to be served copies of the following document(s):

- > Stipulation & [Proposed] Order Enlarging Time For Trans Video To Respond To The U.S. Sony Counterclaims; and
- ➤ Declaration Of Matthew K. Blackburn In Support Of Stipulated Request Enlarging Time For Trans Video To Respond To The U.S. Sony Counterclaims;

On:

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John Flock

jflock@kenyon.com

Walter E. Hanley, Jr.

whanley@kenyon.com

KENYON & KENYON LLP

One Broadway

New York, NY 10004

Tel (212) 425-7200

Fax (212) 425-5288

Megan W. Olesek
molesek@kenyon.com
KENYON & KENYON LLP
333 W. San Carlos St., Suite 600
San Jose, CA 95110
Tel (408) 975-7952
Fax (408) 975-7501

Brett N. Watkins, Esq. bwatkins@kenyon.com KENYON & KENYON LLP 1500 K Street, NW Washington, DC 20005-1257 Tel (202) 220-4430 Fax (202) 220-4201

Attorneys for Defendants SONY ELECTRONICS INC., SONY CORPORATION OF AMERICA, SONY COMPUTER ENTERTAINMENT AMERICA INC., SONY COMPUTER ENTERTAINMENT INC., and SONY CORPORATION,

following the ordinary business practice of Locke Lord Bissell & Liddell, LLP, as follows:

ECF SYSTEM

By electronically filing the document(s) listed above with the Clerk of the Court using the *CM/ECF* System, which will send notification of such filing to all participants in the case pursuant to the attached e-mail notification.

Dated: October 14, 2009

/s/ Matthew K. Blackburn

Matthew K. Blackburn

CERTIFICATE OF SERVICE

Case No. 09 CV 03304 MHP

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DECLARATION OF MATTHEW K. BLACKBURN IN SUPPORT OF STIPULATED REQUEST ENLARGING TIME FOR TRANS VIDEO TO RESPOND TO THE U.S. SONY COUNTERCLAIMS

I, Matthew K. Blackburn, declare as follows:

- 1. I am a partner at the law firm of Locke Lord Bissell & Liddell LLP, counsel of record for Plaintiff and Counter-Defendant Trans Video Electronics, Ltd., in the above-captioned matter. I make this declaration in support of the parties' Stipulated Request Enlarging Time for Trans Video to Respond to the U.S. Sony Counterclaims. I make the following declaration based upon my personal knowledge, and could and would testify thereto under oath if called upon to do so.
- 2. On July 20, 2009, Plaintiff and Counter-Defendant Trans Video Electronics, Ltd. ("Trans Video") commenced the present action by filing a Complaint for patent infringement against Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony Corporation Of America, Sony Computer Entertainment America Inc., Sony Computer Entertainment Inc., and Sony Corporation.
- 3. On August 19, 2009, the parties stipulated [D.I. 10] that responses to the Complaint of Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony Corporation Of America, Sony Computer Entertainment America Inc., would be due September 17, 2009.
- 4. On September 17, 2009, the parties further stipulated [D.I. 17] that the responses to the Complaint of Defendants Sony Computer Entertainment Inc., and Sony Corporation would be due December 15, 2009 and that the responses to the Complaint of Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony Corporation Of America, Sony Computer Entertainment America Inc. would be due September 24, 2009 (an additional one-week extension).

5. On September 24, 2009, Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony

Corporation Of America, Sony Computer Entertainment America Inc. filed and served their Answers

and Counterclaims [D.I. 25-27].

6. Defendants Sony Computer Entertainment Inc. and Sony Corporation have not yet answered,

moved, or otherwise responded to the Complaint.

7. The parties request the foregoing modifications because they agree that the interests of

judicial efficiency, the administration of justice, and the conservation of judicial and the parties'

resources would thus now best be served by a 14-day extension for the Plaintiff and Counter-

Defendant Trans Video to respond to the Counterclaims.

8. Plaintiff and Counter-Defendant Trans Video has not previously sought or received any

enlargements of time to respond to the Counterclaims. The only previous time modifications,

whether by stipulation or Court order, were Docket Nos. 10 and 17 discussed above.

9. The modification requested by the parties in the above Stipulated Request Enlarging Time

For Trans Video To Respond To The U.S. Sony Counterclaims are not believed to have an effect on

the schedule for the case.

10. Prior to filing the above Stipulated Request Enlarging Time for Trans Video to Respond to

the U.S. Sony Counterclaims, I sent it to Megan W. Olesek for review, and she authorized me to file

the Stipulated Request on her behalf.

I declare under penalty of perjury under the laws of the United States of America that the

foregoing is true and correct. Executed on this 14th day of October 2009 at San Francisco,

California.

By: /s/ Matthew K. Blackburn

Matthew K. Blackburn

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DECLARATION OF MATTHEW K. BLACKBURN ISO STIPULATED REQUEST ENLARGING TIME FOR TRANS VIDEO

TO RESPOND TO THE U.S. SONY COUNTERCLAIMS

Case No. 09 CV 03304 MHP

Locke Lord Bissell & Liddell LLP 44 Montgomery Street, Suite 2550 San Francisco, CA 94104

_IPROPOSED| ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, the Court orders the following:

1. Plaintiff and Counter-Defendant Trans Video Electronics, Ltd. ("Trans Video") shall have a 14-day extension of time to respond to the Counterclaims of Defendants and Counter-Plaintiffs Sony Electronics Inc., Sony Corporation Of America, Sony Computer Entertainment America Inc. in this action, to and including October 28, 2009.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

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DATED: October 14, 2009



STIPULATION & [PROPOSED] ORDER ENLARGING TIME FOR TRANS VIDEO TO RESPOND TO THE U.S. SONY COUNTERCLAIMS