

1 Motion is due February 24, 2012, and Novellus' reply in support of the Motion is due March 2, 2012.

2 WHEREAS, the hearing on the Motion is currently scheduled for May 11, 2012;

3 WHEREAS, the parties agree that the current briefing and hearing schedule does not
4 provide a sufficient amount of time for the parties to conduct discovery related to the Motion and
5 for the parties to prepare their respective response and reply briefs;

6 NOW, THEREFORE, the parties stipulate to the following: Poris' response to the Motion
7 shall be due by May 11, 2012; Novellus' reply in support of the Motion shall be due by May 30,
8 2012. The hearing on the Motion shall be rescheduled for June 15 at 9:00 a.m. The parties
9 further stipulate that this stipulation is premised on the parties' mutual assumption that necessary
10 discovery will be obtained without recourse to the Court and without undue delay because of
11 witness unavailability. The parties agree that either party may seek further modification of this
12 schedule from the Court in the event of unforeseen discovery delays.

13
14 Respectfully stipulated to by:

15 KING & KELLEHER, LLP

IRELL & MANELLA LLP

16 By: /s/ Edward Vincent King, Jr.
Edward Vincent King, Jr.

By: /s/ Justin E. Klaeb
Justin E. Klaeb

17 Attorneys for Plaintiff and
18 Counterclaim-Defendant
JAIME PORIS

Attorneys for Defendant and Counterclaimant
NOVELLUS SYSTEMS, INC.

19 Date: February 22, 2012

Date: February 22, 2012

20 **ATTESTATION OF CONCURRENCE**

21 I hereby attest that concurrence in the filing of the document has been obtained from the
22 other signatory.

23 By: /s/ Justin E. Klaeb
Justin E. Klaeb

24
25 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

26 DATED: February 23, 2012

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Hon. Jeffrey S. White
United States District Judge