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SAFENET, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CLOAKWORKS, INC.

Plaintiff,

v.

SAFENET, INC.,

Defendant.

Case No. CV 10-1496 WHA

**STIPULATION TO AMEND
INFRINGEMENT CONTENTIONS
AND ~~PROPOSED~~ ORDER**

1 Pursuant to stipulation by and between the parties hereto, plaintiff CloakWorks, Inc.
2 (“CloakWorks”) and defendant SafeNet, Inc. (“SafeNet”) through their respective attorneys of
3 record, hereby request that the Court set the dates of certain events relating to this patent case,
4 on the dates set forth below.

5 Pursuant to the Court approved claim construction schedule of August 23, 2010,
6 CloakWorks had served its initial infringement contentions on August 6, 2010, the date due.
7 CloakWorks now wishes to amend its infringement contentions. Thus, the parties propose that
8 CloakWorks be permitted to amend on or before September 15, 2010. The parties stipulate
9 that SafeNet be given an extension to serve their invalidity contentions until October 4, 2010.
10

11 The parties represent that this extension will not delay any other dates set forth in the
12 current schedule nor does it affect any dates on the July 23, 2010 scheduling order.

13 Accordingly, the parties stipulate and request that the Court order the following
14 deadlines for the following case events:
15

Event	Dates
Service of Amended Infringement Contentions	September 15, 2010
Service of Invalidity Contentions and Document Production [LR 3-4 & 3-7]	October 4, 2010

20
21 DATED: September 10, 2010

HOSIE RICE LLP

22
23 */s/Bruce Wecker*
24 Bruce Wecker
25 *Attorneys for Plaintiff*
26 *CLOAKWORKS, INC.*
27
28

MORGAN LEWIS & BOCKIUS LLP

/s/Rita E. Tautkus

Rita E. Tautkus
Attorneys for Defendant
SAFENET, INC.

CERTIFICATION PURSUANT TO GENERAL ORDER 45

Pursuant to General Order 45X.B, I, Bruce Wecker, attest that the above signatories for the Defendant has concurred and consented to the filing of this document.

DATED: September 10, 2010

/s/Bruce Wecker

Bruce Wecker


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ORDER

Pursuant to stipulation, Cloakworks will serve its amended infringement contentions on or before September 15, 2010, and SafeNet will serve its invalidity contentions and related document production on or before October 4, 2010. As both sides have agreed, **no deadlines set forth in the case management order or the claim construction schedule will be affected by this stipulation.** Furthermore, no deadlines will be extended on account of these amended contentions.

IT IS SO ORDERED.

Dated: September 10, 2010.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE