

Dewey & LeBoeuf LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303

1 ALDO A. BADINI (SBN 257086)
Dewey & LeBoeuf LLP
2 1950 University Avenue, Suite 500
East Palo Alto, CA 94303
3 Telephone: (650) 845-7050
Facsimile: (650) 845-7333
4 Email: abadini@dl.com

5 Counsel for Defendants
PANASONIC CORPORATION
6 PANASONIC CORPORATION OF NORTH AMERICA

7 CHRISTOPHER B. HOCKETT (SBN 121539)
Davis Polk & Wardwell LLP
8 1600 El Camino Real
Menlo Park, California 94025
9 Telephone: (650) 752-2000
Facsimile: (650) 752-2111

10 Counsel for Defendant
11 SD-3C, LLC

12 SIMON J. FRANKEL
Covington & Burling LLP
13 One Front Street
San Francisco, CA 94111-5356
14 Telephone: (415) 591-6000
Facsimile: (415) 591-6091

15 Counsel for Plaintiff
16 SAMSUNG ELECTRONICS CO., LTD.

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 SAMSUNG ELECTRONICS CO., LTD.,)
a Korean corporation,)
21 Plaintiff,)
)
22 v.)
)
23)
)
24 PANASONIC CORPORATION, a Japanese)
corporation; PANASONIC CORPORATION)
25 OF NORTH AMERICA, a Delaware)
corporation; and SD-3C LLC, a Delaware)
26 limited liability company,)
)
27 Defendants.)
28)

No. CV 10-3098 JSW

JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
MOTION TO DISMISS PAGE LIMITS

Dewey & LeBoeuf LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WHEREAS the Court's August 25, 2011 Order dismissing the First Amended Complaint in the above-captioned matter provided for Plaintiff Samsung Electronics Co., Ltd., to file its Second Amended Complaint on or before September 16, 2011, and for Defendants Panasonic Corporation, Panasonic Corporation of North America, and SD-3C LLC to file their response to the Second Amended Complaint within twenty days thereafter;

WHEREAS Plaintiff filed its Second Amended Complaint on September 16, 2011;

WHEREAS Defendants intend to file a joint motion to dismiss the Second Amended Complaint;

WHEREAS counsel for Defendants and counsel for Plaintiff have conferred and have agreed that given the nature of the issues being briefed and the fact that one joint brief rather than two separate briefs will be submitted by Defendants, the page limits set forth in the Court's September 20, 2010 Order setting the page limits for the briefing of Defendants' joint motion to dismiss the original Complaint, which were also made applicable to the parties' briefing of Defendants' joint motion to dismiss the First Amended Complaint pursuant to a stipulation that was So Ordered by the Court on October 22, 2010, should also, with the Court's consent, apply to the parties' briefing of Defendants' joint motion to dismiss the Second Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN THE PARTIES HERETO, through their respective counsel, that the page limits set forth in the Court's September 20, 2010 Order shall apply to the parties' briefing of Defendants' joint motion to dismiss the Second Amended Complaint: namely, 30 pages for a joint opening Defendants' brief; 30 pages for Plaintiff's opposition; and 20 pages for Defendants' joint reply.

Dewey & LeBoeuf LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: September 26, 2011

Respectfully submitted,

DEWEY & LEBOEUF LLP

By: s/Aldo A. Badini

Aldo A. Badini (SBN 257086)
Dewey & LeBoeuf LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303
Telephone: (650) 845-7050
Facsimile: (650) 845-7333
Email: abadini@dl.com

Counsel for Defendants
Panasonic Corporation and
Panasonic Corporation of North America

DAVIS POLK & WARDWELL LLP

By: s/ Christopher B. Hockett

Christopher B. Hockett (SBN 121539)
Neal A. Potischman (SBN 254862)
Samantha H. Knox (SBN 254427)
1600 El Camino Real
Menlo Park, California 94025
Telephone: (650) 752-2000
Facsimile: (650) 752-2111

Counsel for Defendant SD-3C, LLC

*Pursuant to General Order No. 45 § X.B., the filer attests that concurrence
in the filing of this document has been obtained from the above signatory.*

COVINGTON & BURLING LLP

By: s/Simon J. Frankel

Simon J. Frankel
Evan Robert Cox
One Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

Derek Ludwin
Jonathan Gimblett
J. Maren Schmidt
Timothy C. Hester
1201 Pennsylvania Ave., NW
Washington, DC 20004
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

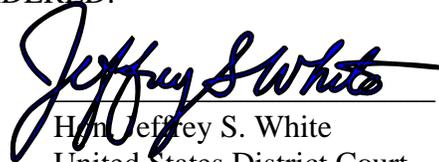
Counsel for Plaintiff
Samsung Electronics Co., Ltd.

*Pursuant to General Order No. 45 § X.B., the filer attests that concurrence
in the filing of this document has been obtained from the above signatory.*

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 28, 2011


Hon. Jeffrey S. White
United States District Court

Dewey & LeBoeuf LLP
1950 University Avenue, Suite 500
East Palo Alto, CA 94303