1	[Counsel listed on signature page]	
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8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO	O DIVISION
11	ORACLE AMERICA, INC.	Case No. CV 10-03561 WHA (DMR)
12	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO EXTEND THE CUT-
13 14	V.	OFF FOR THE DEPOSITIONS OF MOTOROLA MOBILITY, INC.,
	GOOGLE INC.	DIPCHAND NISHAR, AND TIMOTHY LINDHOLM
15	Defendant.	Judge: Honorable William H. Alsup
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28	STIPULATION TO EXTEND THE CUT-OFF FOR THE DEPOSITIONS TIMOTHY LINDHOLM CASE NO. CV 10-03561 WHA (DMR) pa-1479939	OF MOTOROLA, DIPCHAND NISHAR, AND

1	STIPULATION
2	WHEREAS, fact discovery in this case closed on August 15, 2011, except that the parties
3	were permitted to schedule the depositions of senior executives up to August 31, 2011;
4	WHEREAS, the parties have completed all but three fact depositions, described below;
5	WHEREAS, Oracle America, Inc. ("Oracle") served a Subpoena to Testify at a
6	Deposition in a Civil Action on third-party Motorola Mobility, Inc. ("Motorola"), pursuant to
7	Federal Rule of Civil Procedure 30(b)(6), on July 14, 2011;
8	WHEREAS, Motorola had declined to provide a date for the deposition, Oracle filed a
9	Motion to Compel Deposition of Motorola on August 5, 2011, in the U.S. District Court for the
10	Northern District of Illinois;
11	WHEREAS, on August 11, 2011, Judge Der-Yeghiayan of the U.S. District Court for the
12	Northern District of Illinois directed Motorola to provide one or more witnesses for oral
13	deposition in response to Oracle's Rule 30(b)(6) deposition topics within one month of
14	August 11, 2011;
15	WHEREAS, the parties agree to an extension of the deposition discovery cut-off to
16	September 11, 2011, for the limited purpose of completing the Motorola deposition;
17	WHEREAS, on August 10, 2011, Judge Ryu granted Oracle's motion to depose former
18	Google employee Dipchand Nishar for a maximum of three hours, exclusive of breaks, on topics
19	relevant to the willfulness of Google's alleged patent infringement and Android's place in
20	Google's mobile strategy;
21	WHEREAS, Mr. Nishar is available for deposition on September 8, 2011, and Oracle has
22	served a subpoena for his deposition on that date;
23	WHEREAS, the parties agree to an extension of the deposition discovery cut-off to
24	September 8, 2011, for the limited purpose of completing Mr. Nishar's deposition;
25	WHEREAS, on August 25, 2011, Judge Ryu granted Oracle's motion for production of
26	certain e-mails of Timothy Lindholm and ordered that Mr. Lindholm's deposition be scheduled
27	promptly;
28	WHEREAS, Mr. Lindholm's deposition has been scheduled for September 7, 2011; and STIPULATION TO EXTEND THE CUT-OFF FOR THE DEPOSITIONS OF MOTOROLA, DIPCHAND NISHAR, AND TIMOTHY LINDHOLM [1 CASE NO. CV 10-03561 WHA (DMR) pa-1479939

1	WHEREAS, the parties agree to an extension of the deposition discovery cut-off to	
2	September 7, 2011, for the limited purpose of completing Mr. Lindholm's deposition.	
3	NOW THEREFORE THE PARTIES HEREBY STIPULATE AND AGREE that:	
4	1. The deposition discovery cut-off shall be extended to September 11, 2011, for the	
5	limited purpose of completing the Motorola deposition on Oracle's Rule 30(b)(6) topics.	
6	2. The deposition discovery cut-off shall be extended to September 8, 2011, for the	
7	limited purpose of completing the deposition of Dipchand Nishar.	
8	3. The deposition discovery cut-off shall be extended to September 7, 2011, for the	
9	limited purpose of completing the deposition of Timothy Lindholm.	
10	4. No other deadlines in this case will be affected by the foregoing extensions. The	
11	parties will not use these extensions to argue for a delay of the trial date or any other deadlines in	
12	this case.	
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14	ORDER	
15	The foregoing stipulation is approved, and IT IS SO ORDERED.	
16	No more discovery extensions will be granted.	
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18	Date: <u>September 1, 2011.</u> Honorable William Alsup Judge of the United States District Court	
19	Judge of the United States District Court	
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1	Dated: September 1, 2011	MORRISON & FOERSTER LLP
2		
3		By: <u>/s/ Daniel P. Muino</u> Daniel P. Muino
4		MORRISON & FOERSTER LLP
5		MICHAEL A. JACOBS (Bar No. 111664) mjacobs@mofo.com MARC DAVID PETERS (Bar No. 211725)
6		mdpeters@mofo.com DANIEL P. MUINO (Bar No. 209624)
7		dmuino@mofo.com 755 Page Mill Road
8		Palo Alto, CA 94304-1018 Telephone: (650) 813-5600
9		Facsimile: (650) 494-0792
10		BOIES, SCHILLER & FLEXNER LLP DAVID BOIES (Admitted <i>Pro Hac Vice</i>)
11		dboies@bsfllp.com 333 Main Street
12		Armonk, NY 10504 Telephone: (914) 749-8200
13		Facsimile: (914) 749-8300
14		STEVEN C. HOLTZMAN (Bar No. 144177) sholtzman@bsfllp.com
15		1999 Harrison St., Suite 900 Oakland, CA 94612
16		Telephone: (510) 874-1000 Facsimile: (510) 874-1460
17		ORACLE CORPORATION
18 19		DORIAN DALEY (Bar No. 129049) dorian.daley@oracle.com DEBORAH K. MILLER (Bar No. 95527)
20		deborah.miller@oracle.com MATTHEW M. SARBORARIA (Bar No.
20		211600) matthew.sarboraria@oracle.com
21		500 Oracle Parkway Redwood City, CA 94065
22		Telephone: (650) 506-5200 Facsimile: (650) 506-7114
23 24		Attorneys for Plaintiff
25		ORACLE AMERICA, INC.
26		
27		
28		
	STIPULATION TO EXTEND THE CUT-OFF FOR THE DEP TIMOTHY LINDHOLM CASE NO. CV 10-03561 WHA (DMR) pa-1479939	OSITIONS OF MOTOROLA, DIPCHAND NISHAR, AND

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1	Dated: September 1, 2011	KING & SPALDING LLP
2		
3		By: <u>/s/ Matthias Kamber</u> Matthias Kamber
4		KEKER & VAN NEST LLP
5		ROBERT A. VAN NEST (SBN 84065) rvannest@kvn.com
6		CHRISTA M. ANDERSON (SBN184325) canderson@kvn.com DANIEL PURCELL (SBN 191424)
7		dpurcell@kvn.com 633 Battery Street
8		San Francisco, CA 94111-1809 Telephone: (415) 391-5400
9		Facsimile: (415) 397-7188
10		SCOTT T. WEINGAERTNER (<i>Pro Hac Vice</i>) sweingaertner@kslaw.com
11		ROBERT F. PERRY rperry@kslaw.com
12		BRUCE W. BABER (<i>Pro Hac Vice</i>) bbaber@kslaw.com
13		1185 Avenue of the Americas New York, NY 10036-4003
14		Telephone: (212) 556-2100 Facsimile: (212) 556-2222
15		DONALD F. ZIMMER, JR. (SBN 112279)
16		fzimmer@kslaw.com CHERYL A. SABNIS (SBN 224323)
17		csabnis@kslaw.com KING & SPALDING LLP
18		101 Second Street - Suite 2300 San Francisco, CA 94105
19		Telephone: (415) 318-1200 Facsimile: (415) 318-1300
20		GREENBERG TRAURIG, LLP
21		IAN C. BALLON (SBN 141819) ballon@gtlaw.com
22		HEATHER MEEKER (SBN 172148) meekerh@gtlaw.com
23		1900 University Avenue East Palo Alto, CA 94303
24		Telephone: (650) 328-8500 Facsimile: (650) 328-8508
25		Attorneys for Defendant
26		GOOGLE INC.
27		
28	STIPULATION TO EXTEND THE CUT-OFF FOR THE DEP TIMOTHY LINDHOLM CASE NO. CV 10-03561 WHA (DMR) pa-1479939	OSITIONS OF MOTOROLA, DIPCHAND NISHAR, AND

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1	ΑΤΤΕSΤΑΤΙΩΝΙ	
1	ATTESTATION	
2	I, Daniel P. Muino, am the ECF User whose ID and password are being used to file	
3	this STIPULATION AND [PROPOSED] ORDER TO EXTEND THE CUT-OFF FOR	
4	THE DEPOSITIONS OF THIRD PARTIES MOTOROLA MOBILITY, INC. AND	
5	DIPCHAND NISHAR. In compliance with General Order 45, X.B., I hereby attest that	
6	Matthias Kamber has concurred in this filing.	
7		
8	Date: September 1, 2011/s/ Daniel P. MuinoDaniel P. Muino	
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