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 Rambus Inc.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

18 INTERNATIONAL BUSINESS
 MACHINES CORPORATION,

19 Plaintiff,

20 v.

21 RAMBUS INC.,

22 Defendant.
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CASE NO. C 10-04017-JSW
 (Related Case: C 10-03736-JSW)

**STIPULATION RE: CASE SCHEDULE;
 SUPPORTING DECLARATION OF TINA E.
 HULSE;
 [PROPOSED] ORDER**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff International Business Machines Corporation (“IBM”) and Defendant Rambus Inc. (“Rambus”), through their respective counsel of record, respectfully request, and with the Court’s permission, stipulate to a four-week extension of the current case schedule to allow the parties to effectively discuss settlement. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the January 18, 2011, Civil Minute Order [Dkt. 38] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus shall file opening summary judgment motion	June 24, 2011	July 22, 2011
IBM shall file opposition and cross-motion for summary judgment	July 8, 2011	August 5, 2011
Rambus shall file reply and opposition to cross-motion for summary judgment	July 22, 2011	August 19, 2011
IBM shall file reply in support of cross-motion for summary judgment	July 29, 2011	August 26, 2011
Hearing on Cross-Dispositive Motions	August 26, 2011	September 23, 2011, or any later date, subject to the convenience of the Court’s calendar

By her signature below, counsel for Defendant attests that counsel for Plaintiff concurs in the filing of this stipulation.

Respectfully submitted,

Dated: April 14, 2011

By: /s/ Edward A. Kmett
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 15, 2011



The Honorable Jeffrey S. White
United States District Judge
Northern District of California