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Attorneys For Plaintiff  
 International Business Machines Corporation

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

	)	Case No. C 10-04017 JSW
INTERNATIONAL BUSINESS MACHINES	)	(Related Case: C 10-03736 JSW)
CORPORATION,	)	
	)	<b>STIPULATION RE: CASE</b>
Plaintiff,	)	<b>SCHEDULE;</b>
v.	)	
	)	<b>SUPPORTING DECLARATION OF</b>
RAMBUS, INC.,	)	<b>ROBERT H. FISCHER</b>
	)	
Defendant.	)	<b>[PROPOSED] ORDER</b>
	)	

Pursuant to Rule 6-2 and 7-12 of the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California, Plaintiff International Business Machines Corporation (“IBM”) and Defendant Rambus Inc. (“Rambus”), through their respective counsel of record, wish to advise the Court that the parties have reached a settlement in principle, and accordingly respectfully request, and with the Court's permission, stipulate to an additional two-week extension of the current case schedule to allow the parties to prepare the necessary settlement papers. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the April 15, 2011, Stipulated Order [Dkt. 44] be modified as follows:

<b>EVENT</b>	<b>CURRENT SCHEDULE</b>	<b>PROPOSED SCHEDULE</b>
Rambus files opening summary judgment motion	July 22, 2011	August 5, 2011
IBM shall file opposition and cross-motion for summary judgment	August 5, 2011	August 19, 2011
Rambus shall file reply and opposition to cross-motion for summary judgment	August 19, 2011	September 2, 2011
IBM shall file reply in support of cross-motion for summary judgment	August 26, 2011	September 9, 2011
Hearing on Cross-Dispositive Motions	September 23, 2011, or any later date subject to the Court’s calendar	October 7, 2011, or any later date subject to the Court’s calendar

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

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Respectfully submitted,

Dated: May 11, 2011.

/s/ Robert H. Fischer  
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Anthony M. Zupcic, *Pro Hac Vice*  
Douglas Sharrott, *Pro Hac Vice*  
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Dated: May 11, 2011.

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Attorneys for Plaintiff  
IBM Corporation

Date: May 11, 2011

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By: /s/ Tina E. Hulse  
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Attorneys for Defendant,  
Rambus Inc.



1 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
2 and correct, and this declaration was executed this 11th day of May, 2011.

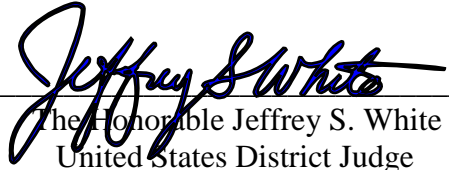
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4 /s/ Robert H. Fischer  
Robert H. Fischer  
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 12, 2011

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