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12 Attorneys for Defendant
 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 two-week extension of the current case schedule to allow the parties to finalize the settlement agreement and associated papers. The parties note that they have exchanged drafts and are currently working on finalizing the papers. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the May 12, 2011, Stipulated Order [Dkt. 46] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus shall file opening summary judgment motion	August 5, 2011	August 19, 2011
IBM shall file opposition and cross-motion for summary judgment	August 19, 2011	September 2, 2011
Rambus shall file reply and opposition to cross-motion for summary judgment	September 2, 2011	September 16, 2011
IBM shall file reply in support of cross-motion for summary judgment	September 9, 2011	September 23, 2011
Hearing on Cross-Dispositive Motions	October 7, 2011	October 21, 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,

Date: May 27, 2011

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

By: /s/ Tina E. Hulse
Tina E. Hulse (CA Bar No. 232936)

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Dated: May 27, 2011

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Attorneys for Plaintiff,
International Business Machines Corporation

SUPPORTING DECLARATION OF TINA E. HULSE

I, TINA E. HULSE, declare as follows:

1. I am an associate at Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P., counsel for Defendant Rambus Inc. (“Rambus”). I submit this declaration in support of the parties’ Stipulation Regarding Case Schedule. I make this declaration of my own personal knowledge and will competently testify thereto if called upon to do so.

2. On April 15, 2011, and May 12, 2011, the Court entered Stipulated Orders [Dkt. Nos. 44 and 46], which set forth a briefing schedule for cross-motions for summary judgment. The May 12, 2011, Stipulated Order [Dkt 46] also set the hearing on cross-dispositive motions for October 7, 2011, or any later date, subject to the convenience of the Court’s calendar.

3. The parties, both the respective corporate representatives and outside counsel, have been actively discussing resolution of this case, have reached a settlement in principle, and have exchanged drafts of the settlement papers and are currently working on finalizing them. Accordingly, the parties have met and conferred and agree that continuing the case schedule for two weeks will facilitate finalization of the necessary settlement papers precedent to resolution of this action.

4. The Court previously granted the Stipulated Orders to permit settlement discussions. Otherwise, the only time modification in this case was to change the Case Management Conference from December 3, 2010, to January 14, 2011, to coincide with the hearing on Rambus’s motion to dismiss. *See* Dkt. 30.

5. The requested modification in the current case schedule will not affect any other pre-trial deadlines, as the pre-trial schedule has not yet been entered in this case.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and this declaration was executed this 27th day of May, 2011.

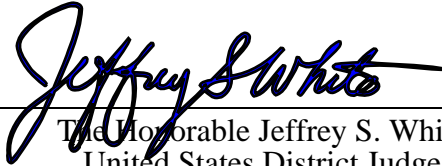
/s/ Tina E. Hulse
Tina E. Hulse

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

June 1
Dated: ~~May~~ __, 2011



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