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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.
 23

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

STIPULATION RE: CASE SCHEDULE;

**SUPPORTING DECLARATION OF ROBERT
 H. FISCHER;**

[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 further time to finalize the settlement agreement and related papers. More specifically, with the Court’s permission, the parties hereby stipulate that the current schedule set forth in the June 1, 2011, Stipulated Order [Dkt. 49] be modified as follows:

EVENT	CURRENT SCHEDULE	PROPOSED DATE
Rambus shall file opening summary judgment motion	August 19, 2011	September 16, 2011
IBM shall file opposition and cross-motion for summary judgment	September 2, 2011	September 30 , 2011
Rambus shall file reply and opposition to cross-motion for summary judgment	September 16, 2011	October 14, 2011
IBM shall file reply in support of cross-motion for summary judgment	September 23, 2011	October 21, 2011
Hearing on Cross-Dispositive Motions	October 21, 2011	November 18, 2011, or any later date, subject to the convenience of the Court’s calendar December 2, 2011

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

Respectfully submitted,

Date: June 10, 2011

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

By: /s/ Tina E. Hulse
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Dated: June 10, 2011

By: /s/ Edward A. Kmett
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Attorneys for Plaintiff,
International Business Machines Corporation

SUPPORTING DECLARATION OF ROBERT H. FISCHER

I, ROBERT H. FISCHER, declare as follows:

1. I am a partner in Fitzpatrick, Cella, Harper & Scinto, counsel for Plaintiff International Business Machines Corporation. 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, May 12, 2011 and June 1, 2011, the Court entered Stipulated Orders [Dkt. Nos. 44, 46 and 49], which set forth a briefing schedule for cross-motions for summary judgment. The June 1, 2011, Stipulated Order [Dkt 49] also set the hearing on cross-dispositive motions for October 21, 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 settlement paper drafts. There are a number of documents involved in the discussions, which have required additional time for full consideration. The parties are now working on resolving outstanding differences, and believe that continuing the case schedule for an additional four weeks will facilitate finalization of the settlement papers precedent to resolution of this action.

4. The Court has 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 10th day of June, 2011.

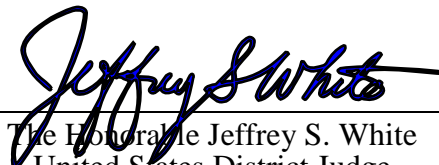
/s/ Robert H. Fischer
Robert H. Fischer

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, AS MODIFIED.

Dated: June 15, 2011



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