

E-Filed 9/2/11

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

INTERWOVEN, INC.,

Plaintiff,

vs.

VERTICAL COMPUTER SYSTEMS, INC.

Defendant.

CIVIL CASE No.: 3:10-cv-04645-RS

**STIPULATED REQUEST FOR ORDER
 CHANGING TIME AND ~~PROPOSED~~ ORDER;
 DECLARATION OF BIJAL V. VAKIL IN
 SUPPORT OF THE SAME**

JURY TRIAL DEMANDED

STIPULATED REQUEST FOR ORDER CHANGING TIME

Pursuant to Local Rule 6-2 of the Local Rules for the Northern District of California, Plaintiff and Counterclaim-Defendant Interwoven, Inc. (“Interwoven”) and Defendant and Counterclaimant Vertical Computer Systems, Inc. (“Vertical”), by and through their respective counsel of record, jointly request the Court for an extension of time for the parties’ filing of their joint claim construction and prehearing statement from September 12, 2011 to October 10, 2011. This requested extension of time does not impact any other dates in the Court’s claim construction schedule (as set forth below). *See* Dkt. 58.

- October 12, 2011: Completion of claim construction discovery.
- October 27, 2011: Vertical shall file its opening claim construction brief.
- November 14, 2011: Interwoven shall file its responsive claim construction brief.
- November 28, 2011: Vertical shall file its reply claim construction brief.
- December 14, 2011 at 10:00 a.m.: Claim Construction Hearing
- February 23, 2012 at 10:00 a.m.: Further Case Management Conference

The parties hereby jointly request the Court for a brief extension for the filing of the joint claim construction and prehearing statement because the parties are, in good faith, working towards a settlement of this dispute and have tentatively scheduled another mediation session on October 3, 2011 (pending confirmation of the mediator’s and the parties’ schedules). This short continuance will provide additional time to continue these discussions to reduce the burdens on the Court. The Declaration of Bijal V. Vakil, provides the information required by Civil L.R. 6-2(a)(1)-(3).

The parties’ stipulated request herein is not made for purposes of delay or harassment, but is based in good faith upon the grounds stated above. For these reasons, the parties

1 respectfully request an Order from this Court changing the date for the parties' filing of their
2 joint claim construction and prehearing statement from September 12, 2011 to October 10, 2011.

3 Dated: September 2, 2011

Respectfully submitted,

5 By: /s/ Bijal V. Vakil

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DEFENDANT INTERWOVEN, INC.

14 Dated: September 2, 2011

Respectfully submitted,

16 By: /s/ Vasilios D. Dossas

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Attorneys for Vertical Computer Systems, Inc.

1 The Court finds that the Stipulated Request for an Order Changing Time is well taken
2 and should be GRANTED.

3 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

4 Dated: 9/2/11

5 
6 Honorable Richard Seeborg
7 United States District Court Judge
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