

E-Filed 9/2/11

1 (All parties and counsel listed on Signature Page)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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10 RAMBUS INC.,
11 Plaintiff,
12 v.
13 BROADCOM CORP.,
14 Defendant.

Case No. 3:10-cv-05437 RS
**UPDATED JOINT CASE MANAGEMENT
STATEMENT REGARDING THE
PARTIES' PROGRESS IN SELECTING A
DISCOVERY SPECIAL MASTER AND
~~PROPOSED~~ ORDER**
Date: No date set
Time: N/A
Judge: Hon. Richard Seeborg
Courtroom 3, 17th Floor

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18 RAMBUS INC.,
19 Plaintiff,
20 v.
21 LSI CORPORATION,
22 Defendant.

Case No. 3:10-cv-05446 RS

23

24 RAMBUS INC.,
25 Plaintiff,
26 v.
27 MEDIATEK INC.,
28 Defendant.

Case No. 3:10-cv-05447 RS

1 RAMBUS INC.,

Case No. 3:10-cv-05449 RS

2 Plaintiff,

3 v.

4 STMICROELECTRONICS N.V.;
5 STMICROELECTRONICS INC.,

6 Defendants.

7 Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure and Civil Local Rule 16-9,
8 Plaintiff Rambus Inc. (“Rambus”) and Defendants Broadcom Corporation (“Broadcom”), LSI
9 Corporation (“LSI”), Mediatek Inc. (“Mediatek”), and STMicroelectronics N.V. and
10 STMicroelectronics Inc. (collectively, “STMicro”) hereby submit the following Updated Joint
11 Case Management Statement Regarding the Parties’ Progress in Selection a Discovery Special
12 Master (“Statement”).

13 By way of background, the parties previously submitted a Joint Case Management
14 Statement on July 28, 2011, and the Court held a Case Management Conference on August 4,
15 2011. At the August 4th Conference, the Court directed the parties to confer (or confer further)
16 regarding a number of issues, including the use and identity of a special master for these related
17 cases, the parties’ proposed schedules, discovery limits, and an index of Rambus’s anticipated
18 production, and submit an Updated Case Management Statement by August 18, 2011.

19 On August 18, 2011, the parties submitted an Updated Case Management Statement that
20 included, among other things, a statement indicating that the parties agreed in principal to the use
21 of a special master and requesting a two-week period for the parties to meet and confer on the
22 selection of a particular special master.¹ While that two-week period has now passed, the parties
23 believe it would be productive to continue meeting and conferring on the issue with the hope that
24 an agreement can be reached. Accordingly, the parties request that the Court permit the parties to
25 continue to meet and confer and report to the Court on the selection of a special master on or
26 _____

27 ¹ Rambus continues to believe that the use of a special master in the Related Cases will multiply
28 rather than minimize the discovery disputes this Court will have to address. Rambus understands,
however, that the Court may wish to designate a special master.

1 before September 12, 2011. If the parties cannot reach an agreement by that date, each party will
2 submit to the Court no more than three names of potential special masters and, if necessary,
3 competing proposals as to how the cost for the special master will be divided among the parties.
4 The Court can then select a special master to be assigned to these related cases and resolve any
5 disputes related thereto.

6 Respectfully submitted,

7
8 DATED: September 1, 2011

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PROPOSED Order

The parties request for an extension of time to meet and confer on the selection of a special master is GRANTED. On September 12, 2011, the parties will submit a report to the Court identifying their selection of a special master for this case. If the parties cannot reach an agreement, each party will submit to the Court no more than three names of potential special masters and, if necessary, competing proposals as to how the cost for the special master will be divided among the parties.

DATED: September 2, 2011



Judge Richard Seeborg
UNITED STATES DISTRICT JUDGE