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 TENSYLON H.P. MATERIAL, INC.  
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9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION  
 12

13 DSM DYNEEMA,  
 14 Plaintiff,  
 15 v.  
 16 BAE SYSTEMS TENSYLON H.P.  
 MATERIAL, INC.,  
 17 Defendant.  
 18

Case No. CV 10-5466 RS  
 STIPULATION AND ~~PROPOSED~~ ORDER  
 CONTINUING DATE TO RESPOND;  
 CONTINUING INITIAL CASE  
 MANAGEMENT CONFERENCE  
 (LR 6-2; 7-12)

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiff DSM Dyneema (“DSM”) and Defendant  
2 BAE Systems Tensylon H.P. Material, Inc. (“BAE Systems”), by and through their respective  
3 counsel of record, hereby submit this Stipulation and Proposed Order seeking a continuance of (1)  
4 the deadline for BAE Systems to answer or otherwise respond to the Complaint, (2) the Initial  
5 Case Management Conference, and (2) other associated deadlines.

6 WHEREAS, BAE Systems’s time to answer or otherwise respond to the First Amended  
7 Complaint (“FAC”) in this action is March 9, 2011;

8 WHEREAS, the Initial Case Management Conference in this action is currently set for  
9 March 24, 2011 under the Court’s December 8, 2010 Scheduling Order;

10 WHEREAS, the last day to file the Joint Case Management Statement and serve Initial  
11 Disclosures is March 17, 2011;

12 WHEREAS, multiple events required by the Local Patent Rules are calendared from the  
13 date of the Initial Case Management Conference, including the disclosure of asserted claims and  
14 infringement contentions, which are due on April 7, 2011 under the current schedule;

15 WHEREAS, the parties are currently engaged in meaningful settlement discussions that  
16 have been ongoing and productive;

17 WHEREAS, the parties have entered prior stipulations to allow DSM to file the FAC and  
18 to extend BAE Systems’s time to answer or otherwise respond (on December 21, 2010, January  
19 4, 2011, and January 27, 2011);

20 WHEREAS, this would be the second extension of time for BAE Systems to answer or  
21 otherwise respond to the FAC;

22 WHEREAS, the parties agree that a further extension of time for BAE Systems to respond  
23 to the complaint and a continuation of the Initial Case Management Conference, and associated  
24 deadlines, will foster fruitful settlement discussions by allowing the parties to avoid the expense  
25 of further litigation and the use of judicial resources while settlement discussions continue;

26 THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

27 The Initial Case Management Conference, presently scheduled for March 24, 2011, be  
28 continued to April 21, 2011 at 10:00 a.m., or as soon thereafter as the Court’s schedule will allow,

1 and that the associated deadlines set forth in the December 8, 2010 Scheduling Order and the  
2 Local Patent Rules be continued accordingly; and

3 The date for BAE Systems to answer or otherwise respond to the FAC is continued to  
4 March 30, 2011.

5 **IT IS SO STIPULATED.**

6  
7 March 4, 2011

**PERKINS COIE LLP**

8  
9 By: /s/ Christopher Kao<sup>1</sup>  
Christopher Kao

10 Attorneys for Defendant BAE SYSTEMS  
11 TENSYLON H.P. MATERIAL, INC.

12 March 4, 2011

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

13  
14 By: /s/ Karin Kramer  
Karin Kramer

15  
16 Attorneys for Plaintiff DSM DYNEEMA.

17  
18 **ORDER**

19 PURSUANT TO STIPULATION, IT IS ORDERED.

20 The Initial Case Management Conference is continued to April 21, 2011 at 10:00 a.m.  
21 The deadlines set forth in the December 8, 2010 Scheduling Order of this Court and the Local  
22 Patent Rules are continued accordingly. BAE Systems shall answer or otherwise respond to the  
23 First Amended Complaint no later than March 30, 2011.

24  
25 Dated: 3/7/11



26 The Hon. Richard Seeborg  
United States District Judge

27  
28 <sup>1</sup> In compliance with General Order 45.X.B, I hereby attest that concurrence in the filing of the  
document has been obtained from each signatory hereto.