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10 Attorneys for Defendants  
 HON HAI PRECISION INDUSTRY CO.,  
 11 LTD. and FOXCONN ELECTRONICS, INC.

Attorneys for Plaintiff  
 LOTES CO., LTD.

12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN FRANCISCO DIVISION

16 LOTES CO., LTD.,  
 17 Plaintiff and Counterclaim Defendant,  
 18 v.  
 19 HON HAI PRECISION INDUSTRY CO.,  
 LTD., and FOXCONN ELECTRONICS, INC.,  
 20 Defendants and Counterclaimants.  
 21

Case No. 3:11-cv-01036 JSW  
**STIPULATION FOR FILING OF  
 AMENDED PLEADINGS, AND  
 22 ~~PROPOSED~~ ORDER THEREON**

The Hon. Jeffrey S. White  
 United States District Judge

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1 Pursuant to Civil Local Rule 7-12 and Federal Rule of Civil Procedure 15, Plaintiff Lotes  
2 Co. Ltd. (“Plaintiff”) and Defendants Hon Hai Precision Industry Co., Ltd. and Foxconn  
3 Electronics, Inc. (“Defendants”) (collectively “the Parties”) hereby agree and stipulate, through  
4 their respective counsel of record, as follows:

5 1. Events have transpired since the inception of this action that have given rise to the  
6 need for the Parties to amend their respective pleadings, as reflected in the proposed amended  
7 pleadings attached hereto.

8 2. Plaintiff may file a Second Amended Complaint in substantially the same form as  
9 previously agreed upon by the parties and attached hereto as Exhibit 1 within ten (10) days of the  
10 date the Court enters an Order on this Stipulation. A copy of Plaintiff’s proposed Second  
11 Amended Complaint, without its accompanying exhibits (which will not change), is attached  
12 hereto as Exhibit 1. A redlined document that compares Plaintiff’s proposed Second Amended  
13 Complaint pleading to its First Amended Complaint is attached hereto as Exhibit 2.

14 3. The parties further agree and stipulate that Exhibits A and B to Plaintiff’s Second  
15 Amended Complaint – which are the same Exhibits A and B previously filed under seal at Docket  
16 Nos. 11-12, based on a prior sealing order of the Court (Docket No. 9) – may be filed under seal  
17 when Plaintiff files its Second Amended Complaint.

18 4. The Parties further agree and stipulate that service of the Second Amended  
19 Complaint on Defendants through the Court’s electronic case filing system (ECF) will satisfy the  
20 service requirements under the Federal Rules of Civil Procedure and Civil Local Rules.

21 5. The Parties further agree and stipulate that Defendants may file a Second  
22 Amended Answer and Counterclaims in response to Plaintiff’s Second Amended Complaint in  
23 substantially the same form as previously agreed upon by the parties and attached hereto as  
24 Exhibit 3. Defendants’ Second Amended Answer and Counterclaims will be filed within the time  
25 permitted under the Federal Rules of Civil Procedure and Civil Local Rules following Plaintiff’s  
26 filing of its Second Amended Complaint.

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1           6.       The Parties further agree and stipulate that Plaintiff may in turn file an answer in  
2 response to Defendants' Second Amended Counterclaims within the time permitted under the  
3 Federal Rules of Civil Procedure and Civil Local Rules.

4 IT IS SO STIPULATED.

5  
6 Dated: May 24, 2013

JONES DAY

7 By: /s/ Gregory L. Lippetz

Gregory L. Lippetz

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12                              Attorneys for Defendants/Counterclaimants  
13                              HON HAI PRECISION INDUSTRY CO., LTD. and  
                                  FOXCONN ELECTRONICS, INC.

14  
15 Dated: May 24, 2013

SHEPPARD MULLIN RICHTER & HAMPTON LLP

16 By: /s/ James M. Chadwick

James M. Chadwick

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21                              Attorneys for Plaintiff/Counterclaim Defendant  
22                              LOTES CO., LTD.

ATTORNEY'S E-FILING ATTESTATION

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2 As the attorney e-filing this document, and pursuant to General Order 45, I hereby attest  
3 that counsel for Plaintiff/Counterclaim Defendants Lotes Co., Ltd. whose electronic signature  
4 appears above has concurred in this filing.

5  
6 Dated: May 24, 2013

JONES DAY

By: /s/ Gregory L. Lippetz

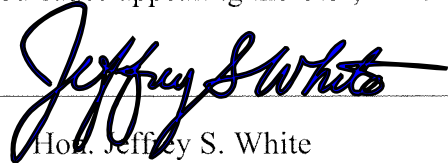
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12 Attorneys for Defendants/Counterclaimants  
13 HON HAI PRECISION INDUSTRY CO., LTD. and  
14 FOXCONN ELECTRONICS, INC.

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16 Pursuant to the Parties' stipulation, and good cause appearing therefor, IT IS SO ORDERED.

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18 Dated: May 29, 2013

  
HON. Jeffrey S. White

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