

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP  
 EDWARD V. ANDERSON, Cal. Bar No. 83148  
 2 JAMES M. CHADWICK, Cal. Bar No. 157114  
 DARREN M. FRANKLIN, Cal. Bar No. 210939  
 3 NATHANIEL P. BRUNO, Cal. Bar No. 228118  
 TENAYA RODEWALD, Cal. Bar No. 248563  
 4 379 Lytton Avenue  
 Palo Alto, California 94301-1479  
 5 Telephone: 650.815.2600  
 Facsimile: 650.815.2601  
 6 evanderson@sheppardmullin.com  
 jchadwick@sheppardmullin.com  
 7 dfranklin@sheppardmullin.com  
 nbruno@sheppardmullin.com  
 8 trodewald@sheppardmullin.com

9 Attorneys for Plaintiff and Counterclaim Defendant  
 LOTES CO., LTD.

10 Gregory L. Lippetz (State Bar No. 154228)  
 11 glippetz@JonesDay.com  
 Laurie M. Charrington (State Bar No. 229679)  
 12 lmcharrington@JonesDay.com  
 JONES DAY  
 13 1755 Embarcadero Road  
 Palo Alto, CA 94303  
 14 Telephone: +1.650.739.3939  
 Facsimile: +1.650.739.3900

15 Attorneys for Defendants and Counterclaimants  
 16 HON HAI PRECISION INDUSTRY CO., LTD. and  
 FOXCONN ELECTRONICS, INC.

18 UNITED STATES DISTRICT COURT  
 19 NORTHERN DISTRICT OF CALIFORNIA

21 LOTES CO., LTD., a Taiwan Corporation,  
 22 Plaintiff and Counterclaim Defendant,  
 23 v.  
 24 HON HAI PRECISION INDUSTRY CO.,  
 LTD., a Taiwan Corporation, and FOXCONN  
 25 ELECTRONICS, INC., a California  
 Corporation,  
 26 Defendants and Counterclaimants.  
 27

Case No. 3:11-cv-01036-JSW

**STIPULATION REGARDING BRIEFING  
 AND HEARING SCHEDULE FOR  
 DEFENDANTS' MOTION FOR  
 PRELIMINARY INJUNCTION, AND  
 [PROPOSED] ORDER THEREON  
 AS MODIFIED**  
 The Hon. Jeffrey S. White  
 United States District Judge

1 IT IS HEREBY STIPULATED by and between Plaintiff and Counterclaim Defendant  
2 Lotes Co., Ltd. (“Plaintiff”) and Defendants and Counterclaimants Hon Hai Precision Industry Co.  
3 Ltd. and Foxconn Electronics, Inc. (“Defendants”), by and through their respective counsel, as  
4 follows:

5 WHEREAS, Defendants filed their Motion for Preliminary Injunction (“Motion”) with this  
6 Court on June 26, 2013;

7 WHEREAS, on June 27, 2013, Defendants noticed the hearing on the Motion for  
8 October 11, 2013, at 9:00 a.m.;

9 WHEREAS, Plaintiff and Defendants agree that the dates currently set for filing and  
10 service of the opposition and reply papers for the Motion should be continued, while the date of  
11 the hearing should remain unchanged;

12 WHEREAS, the parties do not currently contemplate taking any discovery, and will not  
13 seek an extension of the hearing date so long as no intervening, subsequent events alter the current  
14 situation in a manner that might prejudice the parties; and

15 WHEREAS, good cause exists to continue the opposition and reply dates because the  
16 Motion raises complex issues as to infringement and validity of the asserted patent, as well as to  
17 the question of whether irreparable harm would arise in the absence of an injunction. Plaintiff  
18 states that it needs the additional time to gather the evidence necessary to oppose the Motion and  
19 to prepare the briefs and declarations in opposition to the Motion. Plaintiff further states that it is  
20 located in Taiwan and that many of its employees do not speak English, which slows down the  
21 back-and-forth communications about motion strategy and evidence with its California-based  
22 counsel.

23 NOW, THEREFORE, by and between each other, the parties stipulate that the deadline to  
24 file and serve opposition papers to the Motion shall be extended to and including ~~September 12,~~  
25 ~~2013~~ <sup>August 30, 2013</sup> and that the deadline to file and serve reply papers in support of the Motion shall be  
26 extended to and including ~~September 27, 2013.~~ <sup>13, 2013</sup>

27  
28

1 IT IS SO STIPULATED.

2 Dated: August 9, 2013

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3 By: /s/ James M. Chadwick

4 James M. Chadwick  
5 379 Lytton Avenue  
6 Palo Alto, CA 94301-1432  
7 Telephone: 650-815-2600  
8 Facsimile: 650-815-2601  
9 jchadwick@sheppardmullin.com

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

9 Dated: August 9, 2013

JONES DAY

10 By: /s/ Gregory L. Lippetz

11 Gregory L. Lippetz  
12 1755 Embarcadero Road  
13 Palo Alto, CA 94303  
14 Telephone: 650-739-3939  
15 Facsimile: 650-739-3900  
16 glippetz@jonesday.com

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

17 **ATTORNEY'S E-FILING ATTESTATION**

18 As the attorney e-filing this document, and pursuant to Local Rule No. 5.1(i)(3), I hereby  
19 attest that counsel for Defendants and Counterclaimants Hon Hai Precision Industry Co. Ltd. and  
20 Foxconn Electronics, Inc., whose electronic signature appears above has concurred in this filing.

21 Dated: August 9, 2013

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

22 By: /s/ James M. Chadwick

23 James M. Chadwick  
24 379 Lytton Avenue  
25 Palo Alto, CA 94301-1432  
26 Telephone: 650-815-2600  
27 Facsimile: 650-815-2601  
28 jchadwick@sheppardmullin.com

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

1 Pursuant to the Parties' stipulation, and good cause appearing therefor,  
2 IT IS SO ORDERED. AS MODIFIED ABOVE.

3 Dated: August 12, 2013

4   
5 Hon. Jeffrey B. White

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28