

1 Gregory L. Lippetz (State Bar No. 154228)  
 2 glippetz@JonesDay.com  
 3 Laurie M. Charrington (State Bar No. 229679)  
 4 lmcharrington@JonesDay.com  
 5 JONES DAY  
 6 1755 Embarcadero Road  
 7 Palo Alto, CA 94303  
 8 Telephone: +1.650.739.3939  
 9 Facsimile: +1.650.739.3900

6 Daniel T. Conrad (*Pro Hac Vice*)  
 7 dtconrad@JonesDay.com  
 8 JONES DAY  
 9 2727 N. Hardwood Street  
 10 Dallas, TX 75201  
 11 Telephone: +1.650.739.3939  
 12 Facsimile: +1.650.739.3900

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

Edward V. Anderson (Bar No. 83148)  
 evanderson@sheppardmullin.com  
 James Chadwick (Bar No. 157114)  
 jchadwick@sheppardmullin.com  
 Darren M. Franklin (Bar No. 210939)  
 dfranklin@sheppardmullin.com  
 Nathaniel Bruno (Bar No. 228118)  
 nbruno@sheppardmullin.com  
 Tenaya M. Rodewald (Bar No. 248563)  
 trodewald@sheppardmullin.com  
 SHEPPARD MULLIN RICHTER &  
 HAMPTON LLP  
 390 Lytton Avenue  
 Palo Alto, CA 94301  
 Telephone: 650-815-2600  
 Facsimile: 650-815-2601

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.,  
 20 LTD., and FOXCONN ELECTRONICS, INC.,  
 21 Defendants and Counterclaimants.

Case No. 3:11-cv-01036 JSW

**STIPULATION TO EXTEND  
 REMAINING BRIEFING  
 SCHEDULE FOR DEFENDANTS'  
 MOTION FOR PRELIMINARY  
 INJUNCTION, AND ~~PROPOSED~~  
 ORDER THEREON**

The Hon. Jeffrey S. White  
 United States District Judge

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12 and Federal Rule of Civil Procedure  
2 15, Plaintiff Lotes Co. Ltd. (“Plaintiff”) and Defendants Hon Hai Precision Industry Co., Ltd. and  
3 Foxconn Electronics, Inc. (“Defendants”) (collectively “the Parties”) hereby agree and stipulate,  
4 through their respective counsel of record, as follows:

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

7 2. The parties previously stipulated to continue the dates filing and service of the  
8 opposition and reply papers. The Court granted the parties’ stipulated request, and on August 12,  
9 2013, the Court set the date for Defendants’ Reply to September 13, 2013. On August 14, the  
10 Court continued the hearing on the motion for preliminary injunction from October 11 to  
11 November 15, 2013.

12 3. Good cause exists to extend the reply deadline because Defendants need additional  
13 time to obtain information responsive to Lotes’ arguments from Defendants’ employees who are  
14 located in Taiwan, many of whom do not speak English, which slows down the back-and-forth  
15 communications with its California-based counsel.

16 4. Defendants stipulate and agree that if Defendants submit new evidence with their  
17 reply, then Lotes may file a surreply, within ten days of the filing and service of Defendants’  
18 reply.

19 5. The hearing on Defendants’ preliminary injunction motion, currently scheduled for  
20 November 15, 2013 shall remain unchanged.

21 6. Therefore, the parties stipulate and agree that the deadline to file and serve  
22 Defendants’ Reply shall be extended to September 27, 2013, and that any surreply by Lotes shall  
23 be due on or before October 7, 2013.

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1 IT IS SO STIPULATED.

2 Dated: September 10, 2013

JONES DAY

3 By: /s/ Gregory L. Lippetz  
4 Gregory L. Lippetz

5 1755 Embarcadero Road  
6 Palo Alto, CA 94303  
7 Telephone: 650-739-3939  
8 Facsimile: 650-739-3900  
9 glippetz@jonesday.com

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

13 Dated: September 10, 2013

SHEPPARD MULLIN RICHTER & HAMPTON LLP

14 By: /s/ James M. Chadwick  
15 James M. Chadwick

16 379 Lytton Avenue  
17 Palo Alto, CA 94301-1432  
18 Telephone: 650-815-2600  
19 Facsimile: 650-815-2601  
20 jchadwick@sheppardmullin.com

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

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**ATTORNEY'S E-FILING ATTESTATION**

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

Dated: September 10, 2013

JONES DAY

By: /s/ Gregory L. Lippetz  
Gregory L. Lippetz

1755 Embarcadero Road  
Palo Alto, CA 94303  
Telephone: 650-739-3939  
Facsimile: 650-739-3900  
glippetz@jonesday.com

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

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



Dated: September 13, 2013

\_\_\_\_\_  
for  
Hon. Jeffrey S. White

Pursuant to the parties' stipulation, Defendants shall file their reply no later than September 20, 2013. If Lotes seeks to file a sur-reply, Lotes shall seek leave of Court to do so.

SVI-132003v2