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 12 HON HAI PRECISION INDUSTRY CO.,
 LTD. and FOXCONN ELECTRONICS,
 13 INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

18 LOTES CO., LTD., a Taiwan Corporation,
 19 Plaintiff,

20 v.

21 HON HAI PRECISION INDUSTRY CO.,
 LTD., a Taiwan Corporation, and FOXCONN
 22 ELECTRONICS, INC., a California
 Corporation,
 23 Defendants.
 24

Case No. 3:11-CV-01036 JSW

**STIPULATED REQUEST TO
 MODIFY DISCOVERY AND
 BRIEFING SCHEDULE, AND TO
 CHANGE HEARING DATE
 RELATED TO EARLY PARTIAL
 SUMMARY JUDGMENT MOTIONS**

25 Pursuant to Local Rule 6-2, Plaintiff Lotes Co., Ltd (“Plaintiff”) and Defendants Hon Hai
 26 Precision Industry Co., Ltd. and Foxconn Electronics, Inc. (“Defendants”) jointly submit this
 27 stipulated request to modify the discovery and briefing schedule, and to change the hearing date
 28 set by the Court in its January 4, 2012 Order (ECF No. 73).

1 The parties have agreed to modify the discovery and briefing schedule and to reschedule
 2 the hearing date for the motions for partial summary judgment. The parties' proposed revised
 3 schedule is as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>New Stipulated Deadline</u>
Deadline to resolve discovery disputes/limited discovery period closes	---	March 12, 2012
Depositions Completed	March 5, 2012	March 19, 2012
Plaintiffs opening brief on Threshold Issues 1 and 2	March 20, 2012	April 3, 2012
Foxconn's Opposition and Cross-Motion due	April 3, 2012	April 17, 2012
Lotes' Reply/Opposition to Cross-Motion brief due	April 17, 2012	May 1, 2012
Foxconn's Reply in Support of Cross-Motion due	April 24, 2012	May 8, 2012
Hearing on Threshold Issues	May 11, 2012	May 25, 2012

18 The schedule for this case has not yet been set by the Court, and therefore this stipulated
 19 request, if granted, would have no effect other than to change the dates stipulated herein.

20 This request is supported by the Declaration of Laurie Charrington, filed concurrently
 21 herewith.

22 **IT IS SO STIPULATED.**

23 Dated: February 27, 2012

JONES DAY

24 By: /s/ Laurie M. Charrington
 25 Laurie M. Charrington

26 Counsel for Defendants
 27 HON HAI PRECISION INDUSTRY CO. LTD.,
 28 and FOXCONN ELECTRONICS, INC.

1 In accordance with General Order No. 45, Section X(B), the above signatory attests that
2 concurrence in the filing of this document has been obtained from the signatory below.

3 Dated: February 27, 2012

SHEPPARD MULLIN RICHTER &
HAMPTON LLP

4 By /s/ James Chadwick
James Chadwick

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7 Counsel for Plaintiff
8 LOTES CO. LTD.

9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10
11 DATED: March 2, 2012

12 By 
Hon. Jeffrey S. White

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