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 16 SONY COMPUTER ENTERTAINMENT AMERICA LLC and
 17 SONY ELECTRONICS INC.

18 UNITED STATES DISTRICT COURT
 19 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

21 OLYMPIC DEVELOPMENTS AG, LLC,

22 Plaintiff,

23 v.

24 SONY COMPUTER ENTERTAINMENT
 25 AMERICA LLC and SONY ELECTRONICS INC.,

26 Defendants.

Case Nos. 3:11-cv-01080-JCS
consolidated with
 Case No. 3:11-cv-04203-JCS

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO CONTINUE
 AND/OR MODIFY PENDING CASE
 MANAGEMENT DEADLINES;
 DECLARATION OF ABRAN J. KEAN
 IN SUPPORT**

1 Pursuant to Civil L.R. 6-2 and 7-12, Plaintiff Olympic Developments AG, LLC (“Plaintiff”)
2 and Defendants Sony Computer Entertainment America LLC (“SCEA”) and Sony Electronics Inc.
3 (“SEL”) (collectively “the Parties”) stipulate and request that the Initial Case Management
4 Conference and all other pending deadlines set by this Court’s (1) June 17, 2011 Order to Continue
5 Pending Case Management and ADR Deadlines (in the SCEA Action, Doc. 92), and (2) August 23,
6 2011 Order Setting Initial Case Management Conference and ADR Deadlines (in the SEL Action,
7 Consolidated Case No. 11-cv-04203, Doc. 4) be continued as set forth below. Pursuant to Civil L.R.
8 6-2, this joint stipulation is based on the accompanying declaration of Abran J. Kean, which sets
9 forth the following facts upon which the Parties agree:

10 1. The Parties request an extension to the case management deadlines, because of a
11 scheduling conflict with the Initial Case Management Conference. The scheduling conflict regards a
12 medical issue for Defendants’ counsel.

13 2. The Parties further request that the case management deadlines for SEL, recently
14 consolidated with SCEA in this Court, be set to track similar deadlines in this case. Such
15 consolidation of case management deadlines will avoid unnecessary cost and delay, increase
16 inefficiencies for the Parties, and provide economies for the Court.

17 3. The Parties request that the deadlines currently set by the Court’s Orders outlined
18 above be continued as follows:

19 a. The last day to file a Fed. R. Civ. P. 26(f) Report or state objection in the Rule
20 26(f) Report and file a Case Management Statement shall be continued from
21 September 9, 2011 to **September 16, 2011** and/or moved from December 1, 2011
22 to **September 16, 2011**.

23 b. The Initial Case Management Conference currently set for September 16, 2011 at
24 1:30 p.m. shall be continued to **September 23, 2011 at 1:30 p.m.**, and/or
25 expedited from December 8, 2011 to **September 23, 2011 at 1:30 p.m.**, or any
26 later date or time convenient to the Court.

1 c. The last day to complete initial disclosures shall be continued from September 9,
2 2011 to **October 3, 2011** and/or expedited from December 1, 2011 to **October 3,**
3 **2011**. In the event that the Initial Case Management Conference is set for a date
4 other than **September 23, 2011**, the parties agree to exchange initial disclosures
5 no later than 10 days after the Initial Case Management Conference.

6 4. The following are the prior time modifications in the case, whether by stipulation or
7 Court order:

- 8 a. On March 25, 2011, the Parties stipulated to extend SCEA's time to respond to
9 Plaintiff's First Amended Complaint to April 25, 2011;
- 10 b. On April 25, 2011, the Court vacated the April 25, 2011 deadline for SCEA to
11 respond to Plaintiff's First Amended Complaint, instead permitting Plaintiff to
12 file a Second Amended Complaint that same day;
- 13 c. On June 3, 2011, the Parties stipulated to extend ADR deadlines for 14 days to
14 June 17, 2011 to permit the Parties to finalize the agreement set forth above; and
- 15 d. On June 17, 2011, the Parties stipulated to extend the case management and ADR
16 deadlines to permit the Parties to effectuate the severance of SEL from a related
17 case and consolidate it with SCEA.

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1 WHEREFORE, the Parties, by and through their respective counsel, hereby stipulate to and
2 respectfully request this Court to enter an Order continuing or modifying the pending case
3 management deadlines, as stated above.
4

5 Dated: September 8, 2011

Respectfully submitted,

WHITE FIELD, INC.

By: /s/

Steven W. Ritcheson
ATTORNEY FOR PLAINTIFF OLYMPIC
DEVELOPMENTS AG, LLC

11 Dated: September 8, 2011

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/

Eric A. Buresh
Attorneys for Defendants and Counterclaimants
SONY COMPUTER ENTERTAINMENT
AMERICA LLC and SONY ELECTRONICS INC.

17 Pursuant to General Order No. 45.X.B., the below filer attests that concurrence in the filing
18 of this document has been obtained from the above Signatories.

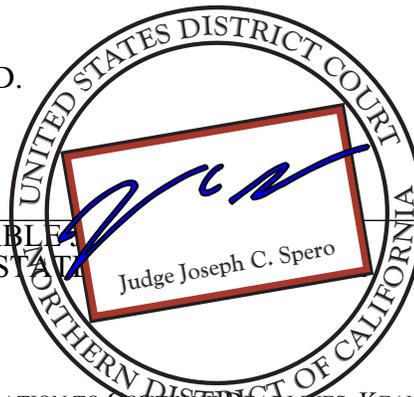
19 Dated: September 8, 2011

/s/
Andrew L. Chang

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

24 Dated: 9/9/2011

HONORABLE
UNITED STATES
Judge Joseph C. Spero



27 JOINT STIPULATION TO CONTINUE DEADLINES; KEAN DECLARATION
28 CASE No. 3:11-cv-01080-JCS CONSOLIDATED WITH CASE No. 3:11-cv-04203-JCS