

1 Steven W. Ritcheson, Esq. (SBN 174062)
 2 WHITE FIELD, Inc.
 3 9800 D Topanga Canyon Blvd. #347
 4 Chatsworth, California 91311
 Telephone: (818) 882-1030
 Facsimile: (818) 337-0383
 swritcheson@whitefieldinc.com

5
6 Attorneys for Plaintiff Olympic Developments AG, LLC

7
8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11
12 OLYMPIC DEVELOPMENTS AG,
 LLC,
 13
 14 Plaintiff,
 vs.
 15 SONY COMPUTER
 ENTERTAINMENT AMERICA LLC
 16
 17 Defendant.

Case No. 3:11-cv-01080-JCS
 Mag. Judge: Hon. Joseph C. Spero

**JOINT STIPULATION AND
 [PROPOSED] ORDER TO
 EXTEND TIME FOR SONY
 COMPUTER ENTERTAINMENT
 AMERICA LLC TO FILE
 RENEWED VERSIONS OF
 MOTIONS OR TO RESPOND TO
 COMPLAINT**

18
19
20 Plaintiff Olympic Developments AG, LLC originally filed this patent case
 21 against Defendant Sony Computer Entertainment America LLC (“SCEA”) in the
 22 Central District of California. In response to Plaintiff’s Complaint, SCEA moved to
 23 dismiss Plaintiff’s claim of indirect infringement (Doc. 39).

24 Before ruling on SCEA’s motion to dismiss, and pursuant to the parties’
 25 stipulation, the Central District Court ordered that the case be transferred to the
 26 Northern District of California. (Doc. 63, 66). The Order transferring the case also
 27 provided that “SCEA shall have 14 days from the docketing of those claims in the
 28 Northern District of California to file a renewed version of the Motion to Dismiss

1 (which may include new arguments and authorities) or otherwise respond to the First
2 Amended Complaint.” (Doc. 66 at 2). The case was docketed with this Court March
3 11, 2011, making SCEA’s renewed motion to dismiss due on March 25, 2011. (Doc.
4 Nos. 68 and 70).

5 The Parties are continuing to confer on the relief requested in SCEA’s motion
6 to dismiss, and jointly request that the Court extend the deadline for SCEA to file its
7 renewed motion to dismiss by thirty (30) days to permit the Parties time to explore
8 whether an agreement can be reached. Pursuant to Civil L.R. 6.1(a), therefore, the
9 Parties now stipulate and agree that SCEA shall have until April 25, 2011 to file a
10 renewed version of its motion to dismiss or otherwise respond to Plaintiff’s First
11 Amended Complaint.

12 The Parties further stipulate that Plaintiff may amend its complaint to remove
13 its allegations of and claims for indirect infringement. If Plaintiff amends its
14 complaint to remove its indirect infringement allegations, then SCEA shall have 14
15 days from service of the amended complaint in which to respond.

16 Pursuant to Civil L.R. 6.2(a), the Declaration of Steven W. Ritcheson setting
17 forth the reasons for the extension accompanies this Joint Stipulation and [Proposed]
18 Order.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

Dated: March 25, 2011

WHITE FIELD, INC.

By: /s/ Steven W. Ritcheson
Steven W. Ritcheson
Attorneys for Plaintiff Olympic
Developments AG, LLC

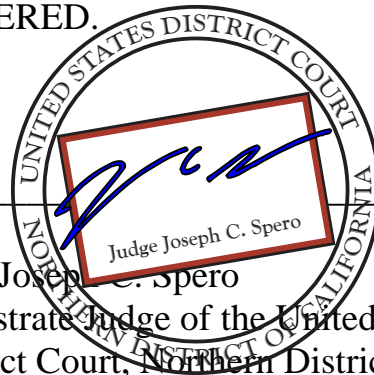
SHOOK, HARDY & BACON L.L.P.

By: /s/ Eric A. Buresh
Eric A. Buresh
Attorneys for Defendant
Sony Computer Entertainment
America LLC

Dated: _____

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 03/28/11



Hon. Joseph C. Spero
Magistrate Judge of the United States
District Court, Northern District

SIGNATURE ATTESTATION

Pursuant to General Order 45.X(B), I hereby attest that concurrence has been obtained from the above-named counsel indicated by a “conformed” signature(s) within this e-filed document.

/s/ Steven W. Ritcheson

Steven W. Ritcheson