

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
John B. Quinn (Bar No. 90378)  
Shon Morgan (Bar No. 187736)  
865 S Figueroa St 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100  
Email: johnquinn@quinnemanuel.com  
shonmorgan@quinnemanuel.com

David Eiseman (Bar No. 114758)  
Melissa J. Baily (Bar No. 237649)  
Carl G. Anderson (Bar No. 239927)  
50 California Street, 22nd Floor  
San Francisco, California 94111  
Telephone: (415) 875 6600  
Facsimile: (415) 875 6700  
Email: davideiseman@quinnemanuel.com  
melissabaily@quinnemanuel.com  
carlanderson@quinnemanuel.com

Attorneys for Plaintiffs  
Barnes & Noble, Inc. and  
barnesandnoble.com llc

CHARLENE M. MORROW (CSB NO.  
136411)  
cmorrow@fenwick.com  
VIRGINIA K. DEMARCHI (CSB NO.  
168633)  
vdemarchi@fenwick.com  
HECTOR J. RIBERA (CSB NO. 221511)  
hribera@fenwick.com  
RYAN TYZ (CSB NO. 234895)  
rtyz@fenwick.com  
RAVI RANGANATH (CSB NO. 272981)  
rranganath@fenwick.com  
FENWICK & WEST LLP  
Silicon Valley Center  
801 California Street  
Mountain View, California 94041  
Telephone: (650) 988-8500  
Facsimile: (650) 938-5200

Attorneys for Defendants  
LSI Corporation and  
Agere Systems Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

BARNES & NOBLE, INC. and  
BARNESANDNOBLE.COM LLC,

Plaintiffs,

v.

LSI CORPORATION and  
AGERE SYSTEMS INC.,

Defendants.

Case No. 11-cv-02709 EMC

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
TIME FOR PATENT LOCAL RULE  
DISCLOSURES**

Trial Date: None set

Pursuant to Local Rule 6-2, Plaintiffs Barnes & Noble, Inc. and Barnesandnoble.com LLC  
("Plaintiffs") and Defendants LSI Corporation and Agere Systems Inc. ("Defendants")  
(collectively, the "Parties"), by and through their respective counsel of record, hereby stipulate  
and agree as follows:

STIPULATION REGARDING TIME FOR  
PATENT LOCAL RULE DISCLOSURES

CASE NO.: 11-CV-02709 EMC

1 WHEREAS, the Court, by Order dated November 2, 2011 [Dkt. No. 63], set a Case  
2 Management Conference in this matter for January 20, 2012, and required the Parties to file a  
3 joint case management conference statement by January 13, 2012;

4 WHEREAS, the Court, by Order dated November 16, 2011 [Dkt. No. 65], granted the  
5 Parties' Joint Stipulation giving Defendants until February 3, 2012 to serve their Disclosure of  
6 Asserted Claims and Infringement Contentions pursuant to Patent L.R. 3-1 and 3-5 and produce  
7 documents pursuant to Patent L.R. 3-2;

8 WHEREAS, the Parties agree that Defendants shall have a sixty day extension until April  
9 3, 2012 to serve their Disclosure of Asserted Claims and Infringement Contentions pursuant to  
10 Patent L.R. 3-1 and 3-5 and produce documents pursuant to Patent L.R. 3-2;

11 WHEREAS, the Parties further agree that all other deadlines for disclosures pursuant to  
12 the Court's Patent Local Rules shall likewise be extended by a period of sixty days, and that the  
13 Parties will provide the Court a complete proposed case schedule in conjunction with their Joint  
14 Case Management Statement and Rule 26 Report;

15 WHEREAS, Defendants believe this extension is appropriate in view of the pending status  
16 of the protective order and Plaintiffs' recently released model of the accused NOOK™ devices;

17 WHEREAS, the Parties do not expect that these proposed extensions will impact the  
18 schedule ultimately set by the Court or alter the date of any event or deadline already fixed by  
19 Court Order, with the exception of the date set forth in the Court's November 16, 2011 Order  
20 granting the Parties' prior Joint Stipulation [Dkt. No. 65];

21 THE PARTIES HEREBY STIPULATE that Defendants shall have until April 3, 2012 to  
22 serve their Disclosure of Asserted Claims and Infringement Contentions pursuant to Patent L.R.  
23 3-1 and 3-5 and produce documents pursuant to Patent L.R. 3-2, all other deadlines for  
24 disclosures pursuant to the Court's Patent Local Rules shall likewise be extended by a period of  
25 sixty days, and the Parties will provide the Court a case schedule providing a complete proposed  
26 case schedule in conjunction with their Joint Case Management Statement and Rule 26 Report.

27 ///

28 ///

1 Dated: December 23, 2011

FENWICK & WEST LLP

2  
3 By: /s/ Ravi Ranganath

4 Ravi Ranganath  
5 Attorneys for Defendants  
6 LSI Corporation and Agere Systems Inc.

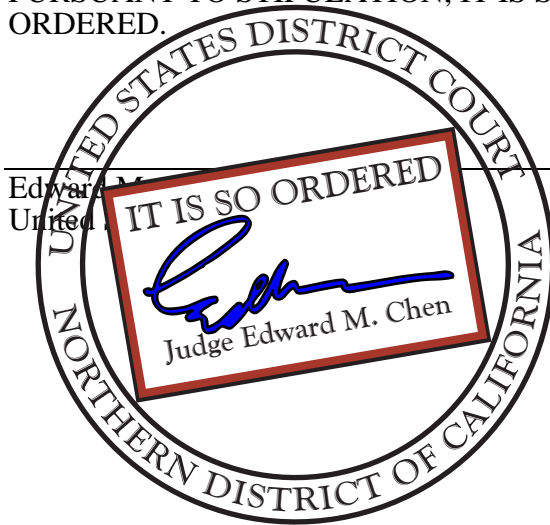
7 Dated: December 23, 2011

8 QUINN EMANUEL URQUHART &  
9 SULLIVAN, LLP

10 By: /s/ Carl G. Anderson

11 Carl G. Anderson  
12 Attorneys for Plaintiffs  
13 Barnes & Noble, Inc. and  
14 barnesandnoble.com LLC

15 PURSUANT TO STIPULATION, IT IS SO  
16 ORDERED.



**ATTESTATION PURSUANT TO GENERAL ORDER 45**

Pursuant to General Order No. 45, § X(B), regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatories.

Dated: December 23, 2011

FENWICK & WEST LLP

By: /s/ Ravi Ranganath

Ravi Ranganath  
Attorneys for Defendants  
LSI Corporation and Agere Systems Inc.