

1 John W. Carpenter (Cal. Bar No. 221708)  
2 Law Offices of John W. Carpenter LLC  
3 12 Metairie Court  
4 Metairie, LA 70001-3032  
5 Telephone: 1-415-577-0698  
6 Facsimile: 1-866-410-6248  
7 Email: john@jwcarpenterlaw.com

8 *Attorneys for Plaintiff,*  
9 *Innovus Prime LLC*

Nicholas A. Brown (CA SBN 198210)  
brownn@gtlaw.com  
Greenberg Traurig LLP  
4 Embarcadero Center, Suite 3000  
San Francisco, CA 94111  
Telephone: 415.655.1300  
Facsimile: 415.707.2010

Richard D. Harris  
harris@gtlaw.com  
Jeffrey G. Mote  
motej@gtlaw.com  
Kevin J. O'Shea  
osheak@gtlaw.com  
Greenberg Traurig LLP  
77 West Wacker Drive  
Chicago, IL 60601  
Telephone: 312.456.8400  
Facsimile: 312.456.8435

*Attorneys for Defendants LG Electronics, Inc.  
and LG Electronics U.S.A., Inc.*

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

16 INNOVUS PRIME LLC,  
17  
18 Plaintiff,  
19 v.  
20 LG ELECTRONICS, INC., et al.,  
21 Defendant(s).

)  
) Case No.: CV-1 1-4223 JW  
)  
) **STIPULATION AND ~~PROPOSED~~**  
) **ORDER PURSUANT TO CIVIL LOCAL**  
) **RULE 6-2 TO EXTEND TIME FOR**  
) **PLAINTIFF AND DEFENDANTS TO**  
) **SUBMIT THEIR JOINT CLAIM**  
) **CONSTRUCTION AND PRE-HEARING**  
) **STATEMENT IN ACCORDANCE WITH**  
) **PATENT LOCAL RULE 4-3**

**Stipulation**

Pursuant to Civil L.R. 6-2, Plaintiff Innovus Prime LLC (“INNOVUS”) and Defendants LG Electronics Inc. et al. (collectively, “LG”) hereby stipulate to extend the time for INNOVUS and LG to submit their Joint Claim Construction and Pre-Hearing Statement in accordance with Patent Local Rules 4-3.

Scheduling conflicts in other matters, as well as unforeseeable issues, including a power outage in the offices of INNOVUS’s attorney that disrupted his operations, have hampered the parties’ efforts to finalize the Joint Claim Construction and Pre-Hearing Statement, which is presently due.

Accordingly, the parties wish to extend the time for filing their Joint Claim Construction and Pre-Hearing Statement from September 10, 2012 to September 14, 2012. The requested time modification will have no effect on the remaining schedule of this case.

This is INNOVUS and LG’s second request for a modification of the date for filing the parties’ Joint Claim Construction and Pre-Hearing Statement under Patent L.R 4-3.

Accordingly, it is hereby stipulated and agreed that INNOVUS and Defendants LG be allowed to submit their Joint Claim Construction and Pre-Hearing Statement on or before September 14, 2012.

Respectfully submitted,

DATED: September 10, 2012

By: /s/ John W. Carpenter

JOHN W. CARPENTER (Cal. Bar No. 221708)  
Law Offices of John W. Carpenter LLC  
12 Metairie Court  
Metairie, LA 70001-3032  
Telephone: 1-415-577-0698  
Facsimile: 1-866-410-6248  
Email: john@jwcarpenterlaw.com

*Attorneys for Plaintiff Innovus Prime LLC*

DATED: September 10, 2012

By: /s/ Nicholas A. Brown  
Nicholas A. Brown (CA SBN 198210)  
brown@gtlaw.com

