1 2 3 4 5 6 7 8	Clinton J. McCord, SBN 204749; cmccord@ EDWARDS WILDMAN PALMER LLP 9665 Wilshire Blvd., Suite 200 Beverly Hills, CA 90212 Telephone No.: 310-860-8700 Fax No.: 310-860-3800 Attorneys for Plaintiff NANOENTEK, INC. (Additional Attorneys listed on signature pag RONALD F. LOPEZ, SBN 111756; rflopez@ NIXON PEABODY One Embarcadero Center, 18th Floor San Francisco, California 94111-3600	;e)	
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14	Attorneys for Defendant BIO-RAD LABOR	ATORIES, INC.	
15		DISTRICT COURT	
16 17		DISTRICT COURT ICT OF CALIFORNIA	
17	NORTHERN DISTR	JCS	
18	NANOENTEK, INC.,	Case No. 3:11-CV-06237-JSW	
19	Plaintiff,	[I'ROPOSED] STIPULATED ORDER REGARDING PROPOSED	
20	VS.	SCHEDULE FOR MARKMAN BRIEFING Joseph C. Spero	
21	BIO-RAD LABORATORIES, INC.,	The Honorable Jeffrey S. White	
22	Defendant.		
23			
24 25			
25	WHEREAS, Plaintiff NanoEnTek, Inc.	("NanoEnTek") and Defendant Bio-Rad	
26	Laboratories, Inc. ("Bio-Rad"), by and through	their respective counsel of record, hereby	
27	STIPULATE AND AGREE that the Court may enter the following order regarding a proposed		
28			
	[PROPOSED] STIPULATED ORDER REGARDING PROPOSED SCHEDULE FOR <i>MARKMAN</i> BRIEFING	3:11-CV-06237-JSW	

1	schedule for Modified Markman briefing pursuant to the Local Patent Rules.		
2			
3	May 25, 2012	Plaintiff's disclosure of asserted claims and infringement contentions and	
4		document production	
5	July 20, 2012	Defendant's invalidity contentions and document production	
6 7	July 27, 2012	Exchange proposed terms for construction	
8	August 10, 2012	Exchange preliminary claim constructions and extrinsic evidence	
9	August 24, 2012	Joint Claim Construction and Prehearing Statement	
10	August 27, 2012	Court mediation to be completed (ECF No. 69)	
11 12	September 24, 2012	Completion of claim construction discovery	
13	September 30, 2012	Deadline to join parties / amend pleadings (ECF No. 69)	
14	October 9, 2012	Plaintiff's opening claim construction brief	
15	October 23, 2012	Defendant's opposing/responsive claim construction brief	
16 17	October 30, 2012	Plaintiff's reply claim construction brief	
17		Amended, Final Joint Claim Construction Statement	
19	JCS November 6, 2012	Tutorial on technology (to be scheduled by the Court)	
20	JCS November 13, 2012	Joint Claim Construction Hearing (to be scheduled by the Court)	
21	May 6, 2013	Fact Discovery Deadline (ECF No. 69)	
22			
23	July 31, 2013	Expert Discovery Deadline; Expert witness list due (ECF No. 69) 9:30 - JCS	
24	August 30, 2013	Dispositive Motion Hearing 9:00 AM in Courtroom 11 (ECF No. 69)	
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	[PROPOSED] STIPULATED C PROPOSED SCHEDULE FOR	= /. = 3111-(1/-106737-18W/	

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2	DATED: May 10, 2012	Respectfully submitted,	
3		EDWARDS WILDMAN PALM	MER LLP
4		/s/ David Cotta Clinton J. McCord, SBN 20474	0
5			
5 6		George W. Neuner (admitted pa gneuner@edwardswildman.com David Cotta (admitted pro hac	n
7		dcotta@edwardswildman.com Adam Samansky (admitted pro	hac vice)
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13		Attorneys for Plaintiff	
14		NANOĚNTEK, INC.	
15	DATED: May 10, 2012	NIXON PEABODY LLP	
16		/s/ Jennifer Hayes	
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18		San Francisco, California 9411 Telephone: (415) 984-8200	
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24			
25		Attorneys for Defendant BIO-RAD LABORATORIES,	INC.
26		,	
27			
28			
	[PROPOSED] STIPULATED ORDER REGARDING PROPOSED SCHEDULE FOR <i>MARKMAN</i> BRIEFING	- 3 -	3:11-CV-06237-JSW

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2	FILER'S ATTESTATION
3	Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
4	all parties have concurred in the filing of this [PROPOSED] STIPULATED ORDER.
5	DATED: May 10, 2012 /s/ Jennifer Hayes
6	DATED: May 10, 2012 /s/ Jennifer Hayes Jennifer Hayes
7	5 TALL CAR
8	TIT IS SO ORDERED
9	PURSUANT TO STIPULATION, IT IS SO ORDERED.
10	DATED: June 18, 2012
11	Jeffrey S. White Joseph C.Spero United States District Judge
12	Magistrate
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_~	[PROPOSED] STIPULATED ORDER REGARDING PROPOSED SCHEDULE FOR <i>MARKMAN</i> BRIEFING - 4 - 3:11-CV-06237-JSW

1	CERTIFICATE OF SERVICE		
2			
3	The undersigned certifies that the [PROPOSED] STIPULATED ORDER was served		
4	via the Court's Electronic Case Management System on all counsel of record on May 10, 2012.		
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6	<u>/s/ Jennifer Hayes</u>		
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28	[PROPOSED] STIPULATED ORDER REGARDING PROPOSED SCHEDULE FOR <i>MARKMAN</i> BRIEFING - 5 - 3:11-CV-06237-JSW		