

1 EDWARD R. REINES (Bar No. 135960)  
 2 edward.reines@weil.com  
 3 SONAL N. MEHTA (Bar No. 222086)  
 4 sonal.mehta@weil.com  
 5 ANNE CAPPELLA (Bar No. 181402)  
 6 anne.cappella@weil.com  
 7 JUSTIN M. LEE (Bar No. 268310)  
 8 justin.m.lee@weil.com  
 9 BLAKE R. DAVIS (Bar No. 294360)  
 10 blake.davis@weil.com  
 11 WEIL, GOTSHAL & MANGES LLP  
 12 Silicon Valley Office  
 13 201 Redwood Shores Parkway  
 14 Redwood Shores, CA 94065  
 15 Telephone: (650) 802-3000  
 16 Facsimile: (650) 802-3100

17 Attorneys for Defendant  
 18 Volterra Semiconductor Corporation

DAVID G. WILLE (Pro Hac Vice) (TX Bar  
 No. 08945388)  
 JEFFERY D. BAXTER (Pro Hac Vice) (TX  
 Bar No. 24006816)  
 AARON DAVIDSON (Pro Hac Vice) (TX Bar  
 No. 24007080)  
 SAMIR A. BHAVSAR (Pro Hac Vice) (TX  
 Bar No. 00798065)  
 BAKER BOTTS L.L.P.  
 2001 Ross Avenue  
 Dallas, TX 75201  
 Telephone: (214) 953-6791  
 Facsimile: (214) 661-4791  
 E-mail: david.wille@bakerbotts.com  
 E-mail: jeff.baxter@bakerbotts.com  
 E-mail: aaron.davidson@bakerbotts.com  
 E-mail: samir.bhavsar@bakerbotts.com

STEPHEN E. TAYLOR (SBN 058452)  
 JONATHAN A. PATCHEN (SBN 237346)  
 CHRISTOPHER A. WIMMER (SBN 263275)  
 TAYLOR & COMPANY LAW OFFICES,  
 LLP  
 One Ferry Building, Suite 355  
 San Francisco, California 94111  
 Telephone: (415) 788-8200  
 Facsimile: (415) 788-8208  
 E-mail: staylor@tcolaw.com  
 E-mail: jpatchen@tcolaw.com  
 E-mail: cwimmer@tcolaw.com

Attorneys for Plaintiff Infineon Technologies  
 AG

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

21 INFINEON TECHNOLOGIES AG,  
 22 Plaintiff,  
 23 vs.  
 24 VOLTERRA SEMICONDUCTOR  
 25 CORPORATION,  
 26 Defendant.

Case No. CV-11-6239 (MMC)  
**STIPULATION AND [PROPOSED]  
 ORDER AMENDING PROTECTIVE  
 ORDER**

Hon. Maxine M. Chesney

1 WHEREAS the Court entered a Stipulated Protective Order on July 17, 2012 (D.I. 104);

2 WHEREAS the parties wish to amend the Stipulated Protective Order to provide  
3 additional specificity as to the procedure and timeline for designating materials and addressing  
4 requests for access to designated material to ensure that the designation of protected materials  
5 does not unnecessarily encumber or retard the case development process;

6 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES that, subject to the  
7 approval of the Court, the following provisions shall be added to the Stipulated Protective Order:

8 5.2 . . .

9 (d) Any designation of Protected Material shall specify which party's  
10 confidential information is disclosed. For production documents (i.e., a party's documents  
11 produced in response to a discovery request), that identification need not be affixed to  
12 each specific document but shall be provided simultaneously with the production (e.g., by  
13 cover letter accompanying a document production).

14 7.5 **Requests for Access to Designated Materials.** A party that has designated Protected  
15 Material shall substantively respond to any reasonable request as to the scope of a designation,  
16 request for redaction, or request for re- or de-designation of Protected Material within two (2)  
17 business days. Any request for access to designated materials under this paragraph shall be made  
18 in good faith, and not to unnecessarily encumber or retard the case development process or to  
19 impose unnecessary expenses and burdens on other parties.

20  
21  
22  
23  
24  
25  
26  
27  
28

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

Dated: April 8, 2014

WEIL, GOTSHAL & MANGES LLP

By:           /s/ Sonal N. Mehta          

Sonal N. Mehta  
*Attorneys for Defendant Volterra  
Semiconductor Corporation*

Dated: April 8, 2014

BAKER BOTTS L.L.P.

By:           /s/ Aaron Davidson          

David G. Wille  
Aaron Davidson  
*Attorneys for Plaintiff  
Infineon Technologies AG*

**ATTESTATION OF E-FILER**

In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and password are being used to file this document, hereby attests that all signatories have concurred in the filing of this document.

Dated: April 8, 2014

          /s/ Sonal N. Mehta            
Sonal N. Mehta

1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION, IT IS SO ORDERED that the following provisions  
3 shall be added to the Stipulated Protective Order in this matter:

4 5.2 . . .

5 (d) Any designation of Protected Material shall specify which party's  
6 confidential information is disclosed. For production documents (i.e., a party's documents  
7 produced in response to a discovery request), that identification need not be affixed to  
8 each specific document but shall be provided simultaneously with the production (e.g., by  
9 cover letter accompanying a document production).

10 7.5 **Requests for Access to Designated Materials.** A party that has designated Protected  
11 Material shall substantively respond to any reasonable request as to the scope of a designation,  
12 request for redaction, or request for re- or de-designation of Protected Material within two (2)  
13 business days. Any request for access to designated materials under this paragraph shall be made  
14 in good faith, and not to unnecessarily encumber or retard the case development process or to  
15 impose unnecessary expenses and burdens on other parties.

16  
17 **IT IS SO ORDERED.**

18  
19 Date: April 10, 2014

20  
21   
22 \_\_\_\_\_  
23 THE HONORABLE MAXINE M. CHESNEY