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12 UNITED STATES DISTRICT COURT  
 13 NORTHERN DISTRICT OF CALIFORNIA  
 14 SAN FRANCISCO DIVISION

16 ARTERIS, S.A.S.,  
 17 Plaintiff,  
 18 v.  
 19 SONICS, INC.,  
 20 Defendant.

Case No. 3:12-CV-00434-WHA-(KAW)

**STIPULATION AND [PROPOSED]  
 ORDER ISSUING REQUEST FOR  
 INTERNATIONAL JUDICIAL  
 ASSISTANCE PURSUANT TO THE  
 HAGUE CONVENTION OF 18 MARCH  
 1970 ON TAKING OF EVIDENCE  
 ABROAD IN CIVIL OR COMMERCIAL  
 MATTERS**

23 AND RELATED COUNTERCLAIMS

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17 ARTERIS S.A.S.

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1 Defendant and Counterclaimant Sonics, Inc. (“Sonics”) and Plaintiff and Counter-  
2 Defendant Arteris, S.A.S. (“Arteris”) (collectively, the “Parties”) hereby stipulate and respectfully  
3 request as follows:

4 WHEREAS, on November 1, 2011, Sonics filed a complaint against Arteris, Inc., alleging  
5 infringement of United States Patents Nos. 6,182,183; 7,266,786; 7,277,975; 6,961,834;  
6 7,191,273; 6,816,814; and 7,299,155 (collectively, the “Sonics Patents-in-Suit”). That action is  
7 currently pending before Judge Armstrong (Case No. 4:11-CV-05311-SBA).

8 WHEREAS, on January 27, 2012, Arteris, S.A.S. filed a countersuit, alleging  
9 infringement of United States Patents Nos. 7,574,629 and 7,769,027 (collectively, the “Arteris  
10 Patents-in-Suit”).

11 WHEREAS, on March 2, 2012, Sonics filed counterclaims against Arteris, S.A.S. alleging  
12 that the Arteris Accused Products (including but not limited to the Arteris FlexNoC, Arteris  
13 FlexWay, Arteris NoCcompiler, FlexArtist, FlexExplorer, FlexVerifier, NoCverifier, and Danube  
14 Network on a Chip Intellectual Property Library), each infringe some or all of the Sonics Patents-  
15 in-Suit.

16 WHEREAS, the Parties have identified several individuals, including the named inventors  
17 of the Arteris Patents-in-Suit, likely to be in possession of relevant information.

18 WHEREAS, Mr. Cesar Douady, who resides and works in France, is a named inventor on  
19 both the Arteris Patents-in-Suit.

20 WHEREAS, the Parties believe that Mr. Douady possesses valuable information and  
21 documents regarding the inventorship and validity of the Arteris Patents-in-Suit.

22 WHEREAS, Sonics believes that as a former Chief Technology Officer of Arteris, S.A.S.,  
23 Mr. Douady also possesses valuable information about the design and development of the Arteris  
24 Accused Products.

25 WHEREAS, Sonics intends to take Mr. Douady’s deposition at a convenient date and  
26 time, preferably in late July, 2012. Arteris will also depose Mr. Douady at this time.

27 WHEREAS, the Parties also intend to request that Mr. Douady produce at his deposition  
28 any documents that are in his possession, custody or control and that pertain to (i) the Arteris

1 Patents-in-Suit, including, but not limited to, inventor notebooks or any documents showing  
2 conception or reduction to practice of the Arteris Patents-in-Suit; (ii) the design and development  
3 of the Arteris Accused Products; and (iii) any communications with Arteris regarding Sonics, or  
4 the *Sonics, Inc. v. Arteris, Inc.* (Case No. 4:11-CV-05311-SBA) or *Arteris, S.A.S. v. Sonics, Inc.*  
5 (Case No. 12-CV-00434-WHA) lawsuits.

6 Based on the foregoing, the Parties hereby stipulate and request that the Request for  
7 International Judicial Assistance, attached herewith as Exhibit A, be issued at the court's earliest  
8 convenience.

9  
10 Dated: June 28, 2012

MORRISON & FOERSTER LLP

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13 By: /s/ Kimberly N. Van Voorhis  
KIMBERLY N. VAN VOORHIS

14 Attorneys for Defendant and  
15 Counterclaimant  
SONICS, INC.

16 Dated: June 28, 2012

DLA PIPER LLP (US)

17  
18 By: /s/ Mark Fowler  
MARK FOWLER

19 Attorneys for Plaintiff and  
20 Counter-defendant  
21 ARTERIS, S.A.S.

22  
23 **DECLARATION OF CONSENT**

24 I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing  
25 of this document has been obtained from the other signatories.

26  
27 Dated: June 28, 2012

/s/ Kimberly N. Van Voorhis  
Kimberly N. Van Voorhis

1 **[PROPOSED] ORDER ISSUING A REQUEST FOR INTERNATIONAL JUDICIAL**  
2 **ASSISTANCE PURSUANT TO THE HAGUE CONVENTION OF 18 MARCH 1970 ON**  
3 **TAKING OF EVIDENCE ABROAD IN CIVIL OR COMMERCIAL MATTERS**

4 The Parties' request is hereby GRANTED.

5 PURSUANT TO STIPULATION, IT IS SO ORDERED.

6 **DATE: July 3, 2012**

*Kandis Westmore*

7 **KANDIS A. WESTMORE**  
8 **UNITED STATES MAGISTRATE JUDGE**

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