

1 Christopher D. Banys (State Bar No. 230038)
2 Daniel M. Shafer (State Bar No. 244839)
3 cdb@lanierlawfirm.com
4 dms@lanierlawfirm.com
5 THE LANIER LAW FIRM, P.C.
6 2200 Geng Road, Suite 200
7 Palo Alto, California 94303
8 Telephone: (650) 322-9100
9 Facsimile: (650) 322-9103

10 Edward C. Flynn (PRO HAC VICE)
11 Mark A. Grace (PRO HAC VICE)
12 Thomas C. Wettach (PA State Bar No. 1414)
13 eflynn@cohengrace.com
14 mgrace@cohengrace.com
15 twettach@cohengrace.com
16 COHEN & GRACE, LLC
17 105 Braunlich Dr., Suite 300
18 Pittsburgh, PA 15237
19 Telephone: (412) 847-0300

20 Attorneys for Plaintiff,
21 SMART MEMORY SOLUTIONS, LLC

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25 IN THE UNITED STATES DISTRICT COURT
26
27 FOR THE NORTHERN DISTRICT OF CALIFORNIA
28
29 SAN FRANCISCO DIVISION

30 SMART MEMORY SOLUTIONS, LLC
31 Plaintiff,
32 v.
33 PANASONIC CORPORATION OF
34 NORTH AMERICA, ET AL.
35 Defendants.

36 Case No. 3:12-cv-00853-EMC

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1 Case Management Report set for July 13, 2012). The parties request that the Initial CMC be
2 continued to August 24, 2012, or such date thereafter as may be convenient for the Court.

3 In support of this stipulated request, the parties state as follows:

- 4 1. On June 26, 2012, the Court acted *sua sponte* (see Dkt. No. 87) to relate this case to
5 two other cases pending in this District: (a) *Smart Memory Solutions, LLC v.*
6 *Freescale Semiconductor, et al.*, Case No. 3:12-cv-01316-EMC (see Dkt. No. 93 in
7 that case); and (b) *Smart Memory Solutions, LLC v. Toshiba America Electronic*
8 *Components, Inc.*, Case No. 3:12-cv-01549-EMC (see Dkt. No. 82 in that case). All
9 three cases are now assigned to Judge Chen, and all are now set for an Initial CMC on
10 July 20, 2012.
- 11 2. The above-mentioned *Freescale* and *Toshiba* cases were, until reassignment, both set
12 for Initial CMC on a later date.
- 13 3. Counsel for all three cases have conferred regarding the new unified CMC date on
14 July 20, 2012. The parties believe that it will be beneficial if they are permitted
15 additional time to coordinate amongst themselves, with respect to any common issues,
16 now that the three cases are deemed related. Likewise, particularly with respect to the
17 *Freescale* and *Toshiba* cases, which were both previously set for a later CMC date,
18 the parties believe that these proceedings will benefit if the parties are permitted
19 additional time to meet and confer thoroughly with respect their Joint Case
20 Management Conference statements, Rule 26(f) requirements, and ADR
21 requirements. (Declaration of Daniel M. Shafer, filed herewith.)
- 22 4. After the currently-scheduled CMC date, the first upcoming date that is available for
23 both the Court and for counsel for the parties in all three cases is August 24, 2012.
- 24 5. There has been one previous stipulated modification of the Initial CMC date in this
25 case (Dkt. No. 91), prior to Court's order relating this case to the *Freescale* and
26 *Toshiba* cases.
- 27 6. The requested modification will have no effect on any other scheduled dates.

28 WHEREFORE, the parties request that the Initial Case Management Conference in this

1 case be reset for August 24, 2012; that the related deadlines for filing a joint CMC statement and
2 serving Initial Disclosures be adjusted accordingly, to August 17, 2012; and that the related
3 deadline for meeting and conferring under Fed. R. Civ. P. 26(f) also be adjusted accordingly, to
4 August 3, 2012.

5 Agreed to by:
6

7 Dated: July 10, 2012

/s/ Daniel M. Shafer

Daniel M. Shafer
THE LANIER LAW FIRM, P.C.
Christopher D. Banys SBN: 230038 (CA)
Daniel M. Shafer SBN: 244839 (CA)
The Lanier Law Firm, P.C.
2200 Geng Road, Suite 200
Palo Alto, CA 94303
Tel: (650) 332-9100
Fax: (650) 322-9103
cdb@lanierlawfirm.com
dms@lanierlawfirm.com

14
15 Counsel for Plaintiff,
16
17 Dated: July 10, 2012 /s/ Gabrielle E. Higgins
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19 Gabrielle E. Higgins (CSB #163179)
20 ROPES & GRAY LLP
21 1900 University Avenue, 6th Floor
East Palo Alto, California 94303-2284
Tel: (650) 617-4000
Fax: (650) 617-4090
gabrielle.higgins@ropesgray.com

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23 Counsel for Defendants,
24 FUJITSU SEMICONDUCTOR
AMERICA, INC. and FUJITSU
SEMICONDUCTOR LTD
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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 Hon. Edward M. Chen
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5 IT IS SO ORDERED
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7 Judge Edward M. Chen
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