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Attorneys for Plaintiff,
 SMART MEMORY SOLUTIONS, LLC

IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SMART MEMORY SOLUTIONS, LLC

Plaintiff,

v.

PANASONIC CORPORATION OF
 NORTH AMERICA, ET AL.

Defendants.

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

**JOINT STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE ; ORDER**

DEMAND FOR JURY TRIAL

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Civil L.R. 6-2, the parties hereto stipulate to this joint request for a continuance of the Initial Case Management Conference. The Initial CMC is currently set for July 20, 2012 (with the deadline for filing a

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
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17 Dated: July 10, 2012

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 Hon. Edward M. Chen

