

1 **JOINT STIPULATION TO ADJOURN CASE MANAGEMENT CONFERENCE**

2 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil L.R. 6-2, the parties hereto stipulate to this
3 joint request that this Court adjourn for thirty (30) days the Initial Case Management
4 Conference (currently scheduled for August 24, 2012), the ADR Phone Conference (currently
5 scheduled for August 21, 2012), and all other deadlines between the parties prior to the Initial
6 Case Management Conference. In support of this motion, the parties state the following:

7 (1). The parties are working to finalize a settlement of this action.

8 (2). Case management deadlines are approaching in this case. By August 17, 2012, the
9 parties are currently required to file a Joint Case Management Conference Statement and serve
10 initial disclosures. An ADR Phone Conference is currently scheduled for August 21, 2012. The
11 Initial Case Management Conference is currently scheduled for August 24, 2012. (*See* ECF
12 Nos. 92, 93.)

13 (3). Adjournment of the deadlines above is justified to permit the parties to finalize their
14 settlement agreement, and in the meantime to avoid the costs that would otherwise be incurred.
15 A stay would also allow this Court to refrain from having to decide multiple, separate, joint
16 motions for extensions of these deadlines.

17 (4). There have been two previous stipulated modifications of the Initial Case
18 Management Conference in this case (ECF Nos. 83, 91). The second stipulated modification
19 (ECF No. 91) was made following reassignment of the *Freescale* (No. 3:12-cv-01316-EMC)
20 and *Toshiba* (No. 3:12-cv-01549-EMC) cases.

21 (5). The requested time modification will have no effect on any other scheduled dates in
22 this case, including the Case Management Conferences in the *Freescale* (No. 3:12-cv-01316-
23 EMC) and *Toshiba* (No. 3:12-cv-01549-EMC) cases, which are still scheduled for August 24,
24 2012.

25 WHEREFORE, the Parties respectfully request that this Court adjourn for thirty (30)
26 days the Initial Case Management Conference, ADR Phone Conference, and all other deadlines
27 between the parties prior to the Initial Case Management Conference.

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Dated: August 8, 2012

/s/ J. Steven Baughman
J. Steven Baughman (*pro hac vice*)
ROPES & GRAY LLP
One Metro Center
700 12th Street, NW, Suite 900
Washington, DC 20005-3948
Tel: (202) 508-4600
Fax: (202) 508-4650
steven.baughman@ropesgray.com

Counsel for Defendants,
FUJITSU SEMICONDUCTOR
AMERICA, INC. and FUJITSU
SEMICONDUCTOR LTD

Dated: August 8, 2012

/s/ Daniel M. Shafer
Daniel M. Shafer
THE LANIER LAW FIRM, P.C.
Christopher D. Banyas 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

Counsel for Plaintiff,
SMART MEMORY SOLUTIONS, LLC

IT IS SO ORDERED that the CMC is reset from 8/24/12 to 10/5/12 at 9:00 a.m. A joint CMC Statement shall be filed by 9/28/12.

Edward M. Chen
U.S. District Judge

