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27 Attorneys for Defendant  
 28 MOTOROLA SOLUTIONS, INC.

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

EON CORP. IP HOLDINGS, LLC,

Plaintiff,

v.

SENSUS USA INC.; et al,

Defendants.

Case No. C12-01011 JST (EDL)

**JOINT STIPULATION TO EXTEND  
 DEADLINES RE EON CORP. IP  
 HOLDINGS, LLC'S MOTION TO  
 COMPEL MOTOROLA SOLUTIONS,  
 INC TO PRODUCE DOCUMENTS AND  
 THINGS AND ORDER**

AND RELATED COUNTERCLAIMS

JOINT STIPULATION TO EXTEND DEADLINES RE EON CORP. IP HOLDINGS,  
 LLC'S MOTION TO COMPEL MOTOROLA SOLUTIONS, INC. TO PRODUCE  
 DOCUMENTS AND THINGS  
 CASE NO. C12-01011 JST (EDL)



1 Plaintiff EON Corp. IP Holdings LLC (“EON”) and Defendant Motorola Solutions Inc.  
2 (“MSI”) hereby stipulate and agree as follows:

3 WHEREAS EON filed a Motion to Compel MSI to Produce Documents and Things (Dkt.  
4 No. 876) on November 26, 2013,

5 WHEREAS MSI’s Opposition to EON’s Motion to Compel is currently due on December  
6 10, 2013,

7 WHEREAS EON’s Reply in further support of its Motion to Compel is currently due on  
8 December 17, 2013,

9 WHEREAS the hearing for the Motion to Compel is currently scheduled for January 7,  
10 2014 at 2:00 p.m.,

11 WHEREAS EON and MSI reached a tentative settlement in principle during a conference  
12 with Magistrate Judge Spero,

13 WHEREAS EON and MSI have therefore agreed in the interest of judicial economy and  
14 the preservation of time to extend the deadlines relating to EON’s Motion to Compel pending  
15 finalization of settlement terms after which this action will be dismissed as to MSI,

16 WHEREAS the Court has previously granted in part four Motions to Shorten Time relating  
17 to other Motions to Compel (Dkt. Nos. 802, 807, 814, 869), and granted one Stipulated Request for  
18 an Extension of Time for Close of Fact Discovery and Expert Reports (Dkt. No. 872),

19 NOW, THEREFORE, the parties, by and through their respective counsel of record, hereby  
20 stipulate and respectfully request that the Court issue an order under Civil L.R. 6-2(a) postponing  
21 the briefing deadlines with respect to EON’s Motion to Compel MSI to Produce Documents and  
22 Things (Dkt. No. 876), such that:

23 (1) MSI’s Opposition to EON’s pending Motion to Compel shall be filed no later than  
24 January 14, 2014,

25 (2) EON’s Reply in support of its Motion to Compel shall be filed no later than  
26 January 21, 2014, and



February 11, 2014.

~~January 28, 2014~~

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(3) The hearing for the Motion to Compel shall be rescheduled to

DATED: December 9, 2013

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By: /s/ Byron R. Chin

BYRON R. CHIN

Attorneys for Defendant  
MOTOROLA SOLUTIONS, INC.

DATED: December 9, 2013

Respectfully submitted,

By: /s/ Nicholas Wyss

Attorneys for Plaintiff  
EON Corp IP Holdings LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: December 10, 2013

Elizabeth D. Laporte

Honorable Elizabeth D. Laporte  
U.S.D.C. Magistrate Judge



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**CERTIFICATION PURSUANT TO L.R. 5-1(i)(3)**

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request.

Executed on December 9, 2013, at San Francisco, California.

/s/ Byron R. Chin

Byron R. Chin

