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 Counterclaimant,
 FREESCALE SEMICONDUCTOR, INC.

15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA
 17 SAN FRANCISCO DIVISION

18 CSR TECHNOLOGY INC., a Delaware
 19 Corporation,

20 Plaintiff and Counter-
 21 defendant,

22 v.

23 FREESCALE SEMICONDUCTOR, INC.,
 a Delaware Corporation,

24 Defendant and
 25 Counterclaimant.

CASE NO. 3:12-cv-02619-RS (JSC)

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO MODIFY BRIEFING SCHEDULE FOR
 FREESCALE SEMICONDUCTOR, INC.'S
 MOTION TO COMPEL**

Hearing Date: Jan. 31, 2013
 Time: 3:00 PM
 Place: Courtroom F, 15th Floor
 Judge: Hon. Jacqueline Scott Corley

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff and Counter-defendant CSR
2 Technology Inc. (“CSR”) and Defendant and Counterclaimant Freescale Semiconductor, Inc.
3 (“Freescale”) (collectively, the “Parties”), by and through their respective counsel, hereby
4 stipulate and agree as follows:

5 WHEREAS, on December 21, 2012, Freescale filed a Motion to Compel Patent L.R. 3-1
6 Disclosures (“Motion to Compel”) (Dkt. No. 40).

7 WHEREAS, CSR’s opposition to Freescale’s Motion to Compel is currently due on
8 January 4, 2013.

9 WHEREAS, Freescale’s reply to the Motion to Compel is currently due on January 11,
10 2013.

11 WHEREAS, the hearing on Freescale’s Motion to Compel is currently scheduled for
12 January 31, 2013, at 1:30 p.m.

13 WHEREAS, on December 21, 2012, CSR’s counsel contacted Freescale’s counsel and
14 requested, as an accommodation to both CSR’s outside and in-house counsel, a brief six-day
15 extension of time to respond to Freescale’s Motion to Compel.

16 WHEREAS, the Parties met and conferred on December 24, 2012, and Freescale agreed
17 to CSR’s request for an extension of time as set forth in the table below and CSR agreed that
18 should Freescale believe it needs additional time to prepare its reply papers after seeing CSR’s
19 opposition, CSR will agree to a continuance of the hearing date and a reasonable extension of
20 time for Freescale to file its reply.

21 WHEREAS, the short extension of the briefing schedule would not conflict with the
22 current case schedule as the noticed hearing date would remain unchanged and the modified
23 briefing schedule would otherwise comport with the Civil Local Rules, *i.e.*, under the modified
24 schedule, CSR’s opposition papers would be due 21 days before the hearing date and Freescale’s
25 reply papers would be due 14 days before the hearing date.

26 WHEREAS, the requested time modification will have no effect on any other date in the
27 schedule for the case.

28

1 WHEREAS, the parties have not previously stipulated to change any date relating to
2 Freescale's Motion to Compel and the only prior extension of time granted in this case is the
3 Court's June 26, 2012, order granting Freescale a thirty-day extension of time to respond to
4 CSR's Complaint (Dkt. No. 12).

5 IT IS HEREBY AGREED AND STIPULATED, that the briefing schedule for Freescale's
6 Motion to Compel shall be modified as follows:

7 Event	Current Due Date	New Due Date
8 CSR Opposition to Motion to Compel	January 4, 2013	January 10, 2013 (21 days before hearing date)
9 Freescale Reply ISO Motion to Compel	January 11, 2013	January 17, 2013 (14 days before hearing date)
10 Hearing Date	January 31, 2013	unchanged

11
12
13 Dated: December 26, 2012

14 DLA PIPER LLP (US)

15 By /s/ Michael Schwartz

16 MARK D. FOWLER
17 TIMOTHY LOHSE
18 MICHAEL G. SCHWARTZ
19 ROBERT WILLIAMS
20 ERIK R. FUEHRER
21 SUMMER KRAUSE

Attorneys for Plaintiff and Counter-defendant
CSR TECHNOLOGY INC.

22 Dated: December 26, 2012

23 JONES DAY

24 By /s/ David Witcoff

25 Patrick T. Michael
26 David L. Witcoff (*Pro Hac Vice*)
27 Timothy J. Heverin (*Pro Hac Vice*)
28 Thomas W. Ritchie (*Pro Hac Vice*)

Attorneys for Defendant and Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

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I, Michael Schwartz, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER TO MODIFY BRIEFING SCHEDULE FOR FREESCALE SEMICONDUCTOR, INC.'S MOTION TO COMPEL. In compliance with Local Rule 5-1, I hereby attest that David Witcoff has concurred in this filing.

Dated: December 26, 2012

DLA PIPER LLP (US)

By /s/ Michael G. Schwartz
MICHAEL G. SCHWARTZ

Attorneys for Plaintiff and Counter-defendant
CSR Technology Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 4, 2013

Hon. Jacquie
United State

