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 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

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

Hearing Date: Jan. 31, 2013  
 Time: 3:00 p.m.  
 Place: Courtroom 3, 17th Floor  
 Judge: Honorable Jacqueline Scott Corley

1 Pursuant to Civil Local Rules 6-2, 7-7 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, on December 21, 2012, CSR’s counsel contacted Freescale’s counsel and  
8 requested, as an accommodation to both CSR’s outside and in-house counsel, a brief six-day  
9 extension of time to respond to Freescale’s Motion to Compel.

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

15 WHEREAS, on December 26, 2012, CSR filed a Stipulation with Proposed Order to  
16 Modify Briefing Schedule for Freescale Semiconductor, Inc.’s Motion to Compel (Dkt. No. 42).

17 WHEREAS, also on December 26, 2012, Judge Seeborg issued an Order Referring Case  
18 To Magistrate Judge For Discovery Purposes (Dkt. No. 43).

19 WHEREAS, on January 3, 2013, Judge Seeborg’s clerk informed counsel for CSR that the  
20 case would be referred to Judge Corley for discovery motions, but that the official order referring  
21 the case would likely issue the week of January 7, 2013.

22 WHEREAS, the parties further met and conferred on January 3 and 4, 2013, and the  
23 parties agreed to a further extension of time for CSR to file its opposition to the Motion to  
24 Compel to January 14, 2013, for Freescale to file a reply to CSR’s opposition by January 24,  
25 2013, and that Freescale would renote the hearing date for its Motion to Compel for February 7,  
26 2013.

27 WHEREAS, on January 3, 2013, Freescale renoticed the hearing on its Motion to Compel  
28 for February 7, 2013, before Judge Corley (Dkt. No. 44).

1 WHEREAS, on January 4, 2013, the Court issued a notice advancing the discovery  
2 hearing for Freescale's Motion to Compel back to January 31, 2013 (Dkt. No. 45) and granted the  
3 parties' stipulation and order to extend the briefing schedule so that CSR's opposition to the  
4 Motion to Compel is due on January 10, 2013, and Freescale's reply is due on January 17, 2013.

5 WHEREAS, on January 4, 2013, the parties further met and conferred and agreed that a  
6 further short extension of time for CSR's opposition and Freescale's reply and one week  
7 extension of the hearing date is reasonable in light of the recent holidays and recent reassignment  
8 of this motion, provided that the Court could accommodate hearing the motion on February 7,  
9 2013 and further provided that, if the Court could not, the parties will abide by the existing  
10 schedule.

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

13 WHEREAS, the parties have once previously stipulated to change the briefing schedule  
14 relating to Freescale's Motion to Compel (Dkt. No. 46) and the only prior extension of time  
15 granted in this case is the Court's June 26, 2012, order granting Freescale a thirty-day extension  
16 of time to respond to CSR's Complaint (Dkt. No. 12).

17 IT IS HEREBY AGREED AND STIPULATED, that the briefing schedule and hearing  
18 date for Freescale's Motion to Compel shall be modified as follows:

Event	Current Due Date	New Due Date
<b>CSR Opposition to Motion to Compel</b>	January 10, 2013	January 14, 2013 (21 days before hearing date)
<b>Freescale Reply ISO Motion to Compel</b>	January 17, 2013	January 24, 2013 (14 days before hearing date)
<b>Hearing Date</b>	January 31, 2013	February 7, 2013 at <b>9:00am</b>

1 Dated: January 7, 2013

2 DLA PIPER LLP (US)

3 By /s/ Michael G. Schwartz

4 MARK D. FOWLER  
5 TIMOTHY LOHSE  
6 MICHAEL G. SCHWARTZ  
7 ROBERT WILLIAMS  
8 ERIK R. FUEHRER  
9 SUMMER KRAUSE

10 Attorneys for Plaintiff and Counter-defendant  
11 CSR TECHNOLOGY INC.

12 Dated: January 7, 2013

13 JONES DAY

14 By /s/ David L. Witcoff

15 Patrick T. Michael  
16 David L. Witcoff (Pro Hac Vice)  
17 Timothy J. Heverin (Pro Hac Vice)  
18 Thomas W. Ritchie (Pro Hac Vice)

19 Attorneys for Defendant and Counterclaimant  
20 FREESCALE SEMICONDUCTOR, INC.

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

26 Dated: January 7, 2013

27 DLA PIPER LLP (US)

28 By /s/ Michael G. Schwartz

MICHAEL G. SCHWARTZ

Attorneys for Plaintiff and Counter-defendant  
CSR Technology Inc.

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**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: January 7, 2013

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THE HONORABLE J  
UNITED STATES DI  
JUDGE

