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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-JST (JSC)

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO CONTINUE THE JOINT CLAIM
 CONSTRUCTION AND PRE-HEARING
 STATEMENT**

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 March 7, 2013, the Court issued Case Management Order No. 2, setting
6 certain deadlines (Dkt. No. 61).

7 WHEREAS, the Joint Claim Construction and Pre-Hearing Statement is currently due on
8 June 24, 2013.

9 WHEREAS, the Parties met and conferred regarding the Joint Claim Construction and
10 Pre-Hearing Statement on June 11th, June 18th and June 20th 2013.

11 WHEREAS, the Parties agree that a continuation of the filing date for the Joint Claim
12 Construction and Pre-Hearing Statement by one day, to June 25, 2013, would allow the parties
13 additional time to meet and confer regarding the Joint Claim Construction and Pre-Hearing
14 Statement.

15 WHEREAS, the short continuation of the Joint Claim Construction and Pre-Hearing
16 Statement would not conflict with, or require any additional changes to, the current case schedule
17 as the Claim Construction briefing, hearing and tutorial dates would remain unchanged.

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

20 WHEREAS, the parties have not previously stipulated to change any date relating to Joint
21 Claim Construction and Pre-Hearing Statement and the only prior extensions of time granted in
22 this case are the Court’s June 26, 2012, order granting Freescale a thirty-day extension of time to
23 respond to CSR’s Complaint (Dkt. No. 12) and the Magistrate Judge Corley’s January 7, 2013,
24 order modifying the briefing schedule and hearing date for Freescale’s Motion to Compel (Dkt.
25 No. 48).

1 IT IS HEREBY AGREED AND STIPULATED, that the Joint Claim Construction and
2 Pre-Hearing Statement shall be continued as follows:

Event	Current Due Date	New Due Date
Joint Claim Construction and Pre-Hearing Statement	June 24, 2013	June 25, 2013

6 Dated: June 21, 2013

8 DLA PIPER LLP (US)

9 By /s/ Michael Schwartz

10 MARK D. FOWLER
11 TIMOTHY LOHSE
12 MICHAEL G. SCHWARTZ
13 ROBERT WILLIAMS
14 ERIK R. FUEHRER
15 SUMMER KRAUSE

16 Attorneys for Plaintiff and Counter-defendant
17 CSR TECHNOLOGY INC.

18 Dated: June 21, 2013

20 JONES DAY

22 By /s/ Thomas W. Ritchie

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

27 Attorneys for Defendant and Counterclaimant
28 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 CONTINUE THE JOINT CLAIM
CONSTRUCTION AND PRE-HEARING STATEMENT. In compliance with Local Rule 5-1, I
hereby attest that David Witcoff has concurred in this filing.

Dated: June 21, 2013

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: June 24, 2013



THE HONORABLE JON S. TIGAI
UNITED STATES DISTRICT COURT JUDGE