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over the assets of*  
QIMONDA AG

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Attorneys for Defendants  
MAGNACHIP SEMICONDUCTOR  
CORPORATION,  
MAGNACHIP SEMICONDUCTOR, INC.,  
MAGNACHIP SEMICONDUCTOR S.A.,  
AND  
MAGNACHIP SEMICONDUCTOR, LTD.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

DR. MICHAEL JAFFÉ  
*in his capacity as Insolvency Administrator  
over the assets of*  
QIMONDA AG

Plaintiff,

v.

MAGNACHIP SEMICONDUCTOR CORP.,  
MAGNACHIP SEMICONDUCTOR, INC.,  
MAGNACHIP SEMICONDUCTOR S.A.,  
MAGNACHIP SEMICONDUCTOR, LTD.

Defendants.

Case No. 12-CV-03166-JST

**JOINT MOTION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
CERTAIN DEADLINES**

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2  
3 Plaintiff Dr. Michael Jaffé, in his capacity as Insolvency Administrator over the assets of  
4 Qimonda AG (“Plaintiff”), and Defendants MagnaChip Semiconductor Corporation, MagnaChip  
5 Semiconductor, Inc., MagnaChip Semiconductor S.A., and MagnaChip Semiconductor, Ltd.  
6 (collectively “MagnaChip”) hereby respectfully request a continuance of the Case Management  
7 Conference and certain deadlines by about four weeks, as set forth below. The parties remain  
8 diligently engaged in settlement discussions and believe that a postponement would be beneficial  
9 so that the parties can continue their discussions with the goal of reaching an amicable  
10 settlement. The settlement discussions have taken longer than anticipated (the parties and their  
11 counsel span three continents), and the parties are hopeful that this continuance will be the last,  
12 and that it will provide them with sufficient time to resolve their settlement discussions. The  
13 parties greatly appreciate the Court’s patience in this regard.

14 WHEREFORE, based upon the foregoing, the parties respectfully request that the Court  
15 grant this “Joint Motion to Continue Case Management Conference and Certain Deadlines” and:

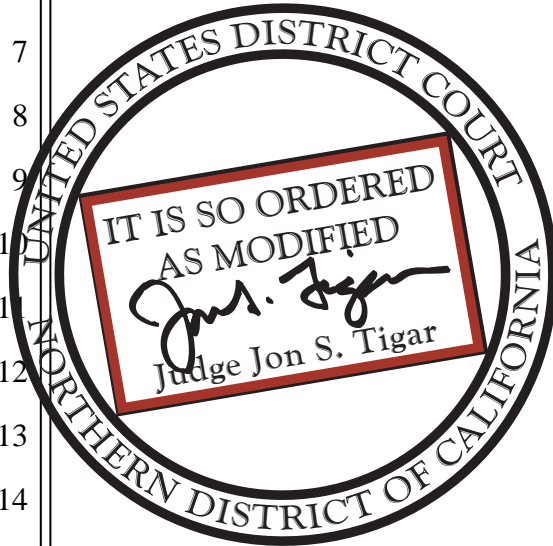
- 16 • Postpone the Case Management Conference until June 19, 2013 (from May 28,  
17 2013 per Dkt. No 229);
  - 18 • Postpone the deadline for Plaintiff’s Opening Claim Construction Brief until June  
19 21, 2013 (from May 24, 2013 per Dkt. No. 229);
  - 20 • Postpone the deadline for Defendants’ Responsive Claim Construction Brief until  
21 June 28, 2013 (from June 8, 2013 per Dkt. No. 229);
  - 22 • Postpone the deadline for Plaintiff’s Claim Construction Reply Brief until July 8,  
23 2013 (from June 15, 2013 per Dkt. No. 229);
  - 24 • Postpone the deadline to complete claim-construction discovery until July 30,  
25 2013 (from July 2, 2013 per Dkt. No. 229);
  - 26 • Postpone the Claim Construction Tutorial until <sup>August 6, 2013 at 9:30 a.m.</sup> ~~August 5, 2013~~ (from July 2,  
27 2013 per Dkt. No. 229); and
- 28

August 6, 2013 at 1:00 p.m.

- Postpone the Markman Hearing until ~~August 5, 2013~~ (from July 2, 2013 per Dkt. No. 229).

Respectfully submitted this 16th day of May 2013.

The court will not grant any further continuances on the basis of continuing settlement discussions.



Dated: May 20, 2013

/s/ Robert Whitman

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12 MAGNACHIP SEMICONDUCTOR, INC.,  
13 MAGNACHIP SEMICONDUCTOR S.A., AND  
14 MAGNACHIP SEMICONDUCTOR, LTD.

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**ATTESTATION OF CONCURRENCE**

I, Robert Whitman, am the ECF User whose ID and password are being used to file this  
“Joint Motion to Continue Case Management Conference and Certain Deadlines.” In  
compliance with Civil Local Rules 5-1, I hereby attest that concurrence in the filing of this  
document has been obtained from each of the above signatories.

Dated: May 16, 2013

By: /s/ Robert Whitman  
Robert Whitman