

1 ROBERT WHITMAN  
2 (NY Bar No. 2497147) (admitted *pro hac vice*)  
rwhitman@kslaw.com

3 KING & SPALDING LLP  
4 1185 Avenue of the Americas  
5 New York, NY 10036  
Telephone: (212) 556-2310  
Facsimile: (212) 556-2222

6 SANJEEET K. DUTTA  
7 (CA Bar No. 203463)  
sdutta@kslaw.com  
8 KING & SPALDING LLP  
9 333 Twin Dolphin Drive, Suite 400  
Redwood Shores, CA 94065  
Telephone: (650) 590-0700  
Facsimile: (650) 590-1900

10 Attorneys for Plaintiff  
11 DR. MICHAEL JAFFÉ,  
12 *in his capacity as Insolvency Administrator*  
13 *over the assets of*  
14 QIMONDA AG

AKIN GUMP STRAUSS HAUER  
& FELD LLP  
Cono A. Carrano (admitted *pro hac vice*)  
Email: ccarrano@akingump.com  
David C. Vondle (Bar No. 221311)  
Email: dvondle@akingump.com  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036  
Telephone: (202) 887-4000  
Facsimile: (202) 887-4288

Reginald D. Steer (Bar No. 056324)  
Email: rsteer@akingump.com  
580 California Street, Suite 1500  
San Francisco, CA 94104  
Telephone: (415) 765-9500  
Facsimile: (415) 765-9501

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

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**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

Case No. 12-CV-03166-JST

Plaintiff,

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

v.

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

Defendants.

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

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

- Postpone the Case Management Conference until June 19, 2013 (from May 28, 2013 per Dkt. No 229);
- Postpone the deadline for Plaintiff’s Opening Claim Construction Brief until June 21, 2013 (from May 24, 2013 per Dkt. No. 229);
- Postpone the deadline for Defendants’ Responsive Claim Construction Brief until June 28, 2013 (from June 8, 2013 per Dkt. No. 229);
- Postpone the deadline for Plaintiff’s Claim Construction Reply Brief until July 8, 2013 (from June 15, 2013 per Dkt. No. 229);
- Postpone the deadline to complete claim-construction discovery until July 30, 2013 (from July 2, 2013 per Dkt. No. 229);
- Postpone the Claim Construction Tutorial until ~~August 5, 2013~~ (from July 2, 2013 per Dkt. No. 229); and

August 6, 2013 at 9:30 a.m.

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.

*/s/ Robert Whitman*

## ROBERT WHITMAN

(NY Bar No. 2497147) (admitted *pro hac vice*)  
rwhitman@kslaw.com  
KING & SPALDING LLP  
1185 Avenue of the Americas  
New York, NY 10036  
Telephone: (212) 556-2310  
Facsimile: (212) 556-2222

SANJEEET K. DUTTA  
(CA Bar No. 203463)  
sdutta@kslaw.com  
KING & SPALDING LLP  
333 Twin Dolphin Drive, Suite 400  
Redwood Shores, CA 94065  
Telephone: (650) 590-0700  
Facsimile: (650) 590-1900

THOMAS C. LUNDIN JR.  
(GA Bar No. 461141) (admitted *pro hac vice*)  
tlundin@kslaw.com  
KING & SPALDING LLP  
1180 Peachtree Street  
Atlanta, GA 30309

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

AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Cono A. Carrano

Cono A. Carrano (admitted *pro hac vice*)  
Email: ccarrano@akingump.com  
David C. Vondle (Bar No. 221311)  
Email: dvondle@akingump.com  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

1 Telephone: (202) 887-4000  
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15 MAGNACHIP SEMICONDUCTOR, LTD.

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19 **ATTESTATION OF CONCURRENCE**

20 I, Robert Whitman, am the ECF User whose ID and password are being used to file this  
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22 “Joint Motion to Continue Case Management Conference and Certain Deadlines.” In  
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24 compliance with Civil Local Rules 5-1, I hereby attest that concurrence in the filing of this  
25  
26 document has been obtained from each of the above signatories.

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28 Dated: May 16, 2013

By: */s/ Robert Whitman*  
Robert Whitman