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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

FUJIFILM CORPORATION,
 Plaintiff,
 v.
 MOTOROLA MOBILITY LLC,
 Defendant.

Case No. C 12-03587 WHO

**STIPULATION AND
 ORDER REGARDING EXTENDING
 DEADLINE FOR THE PARTIES TO
 COMPLETE LIMITED FACT
 DISCOVERY**

1 Plaintiff Fujifilm Corporation and Defendant Motorola Mobility LLC (collectively, the
2 “parties”), by and through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, in the Court’s Order Regarding Scheduling (Docket #82), the Court
4 approved the parties’ agreed-on deadline of July 18, 2014 as the close of fact discovery;

5 WHEREAS, in the Stipulation and Court Order Regarding Ongoing Review of Source
6 Code and Extending Deadline for the Parties to Complete Limited Fact Discovery (Docket #131),
7 the Court approved the parties stipulation to a short extension until August 8, 2014 to complete
8 limited fact discovery, and approved the parties stipulation to permit access to the source code
9 produced by certain third parties for review and printing until at least January 16, 2015;

10 WHEREAS, the parties have endeavored to complete all fact discovery by the extended
11 deadline of August 8, 2014, but believe that it is reasonably necessary that additional time should
12 be afforded to accommodate the schedules of and minimize the burdens on third parties who were
13 subpoenaed for documents and/or testimony before August 8, 2014, including representations
14 from Nvidia Corporation that its designated witness is not available for deposition until the week
15 of August 25-29, 2014.

16 WHEREAS, to accommodate and coordinate with the schedules of third parties whose
17 depositions have been noticed by one or both of the parties for documents and/or testimony, and
18 to afford the parties additional time to attempt to reach agreements on the admissibility of third-
19 party declaration testimony, which could potentially obviate the need for certain third parties to
20 sit for depositions or produce source code, the parties jointly request a short three-week extension
21 of the August 8, 2014 deadline to meet and confer in this regard and complete the taking of
22 discovery from these third parties, including the following contemplated discovery: a deposition
23 of and possible declaration from Nvidia Corporation, a declaration from or possible deposition of
24 OmniVision Technologies, Inc., a declaration from Qualcomm Incorporated, a declaration from
25 Texas Instruments Inc., a declaration from Hewlett-Packard Company, a deposition of Jani
26 Kaikko, and a deposition of Microsoft Corporation.

27 WHEREAS, there has been one prior request for a short extension to the initial July 18,
28 2014 fact discovery deadline, and a further limited extension of this deadline for the limited

1 purpose of conducting third-party discovery will not affect any other Court-set deadlines.

2 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto
3 through their respective attorneys of record that the August 8, 2014 deadline for the taking of fact
4 discovery is (1) extended by two weeks, until August 22, 2014, to complete the taking of
5 discovery from third parties OmniVision, Qualcomm Incorporated, Texas Instruments Inc., and
6 Hewlett-Packard Company, and (2) extended by three weeks, until August 29, 2014 to complete
7 the taking of discovery from third parties Nvidia Corporation, Microsoft Corporation, and Jani
8 Kaikko.

9
10 Dated: August 8, 2014

Respectfully submitted,

11 PHASE M, LLP

12
13 By /s/ Mark K. Dickson

14 MARK K. DICKSON
15 Attorneys for Plaintiff
FUJIFILM CORPORATION

16 Dated: August 8, 2014

Respectfully submitted,

17 MORGAN, LEWIS & BOCKIUS LLP

18
19 By /s/ Mark W. Taylor

20 MARK W. TAYLOR
Attorneys for Plaintiff
FUJIFILM CORPORATION

21 Dated: August 8, 2014

Respectfully submitted,

22 KILPATRICK TOWNSEND & STOCKTON LLP

23
24
25 By /s/ Jordan Trent Jones

26 JORDAN TRENT JONES
Attorneys for Defendant
27 MOTOROLA MOBILITY LLC
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ATTESTATION CLAUSE REGARDING SIGNATURES

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I, Mark K. Dickson, attest that concurrence in the filing of this document has been obtained from each of the other signatories, as indicated by a “confirmed” signature (/s/) within the e-filed document. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed August 8, 2014, at San Mateo, California.

/s/ Mark K. Dickson
Mark K. Dickson

IT IS SO ORDERED.

DATED: August 11, 2014



WILLIAM H. ORRICK, III
United States District Judge