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Attorneys for Defendant SPECIALIZED BICYCLE COMPONENTS, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ICON-IP PTY, LTD., Plaintiff, v. SPECIALIZED BICYCLE COMPONENTS, INC., Defendant.) Case No. CV-12-3844 JST)))) STIPULATION AND PROPOSED) ORDER TO AMEND CONTENTIONS))))))))))
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1 Pursuant to Civil Local Rule 7-1, it is hereby stipulated by and between Plaintiff Icon-IP Pty
2 Ltd. (“Icon”) and Defendant Specialized Bicycle Components, Inc. (“Specialized”), by and through
3 their respective counsel of record that Icon should be allowed to amend its Infringement Contentions
4 as set forth in Plaintiff’s Second Amended L.P.R. 3.1 Disclosure of Asserted Claims and
5 Infringement Contentions, a copy of which is attached hereto as Exhibit A, and Specialized should
6 be allowed to amend its Invalidity Contentions as set forth in Specialized’s Amended Invalidity
7 Contentions, a copy of which is attached hereto as Exhibit B.

8 Pursuant to Patent Local Rule 3-6, amendments to Invalidity and Infringement Contentions
9 are to be made upon a showing of good cause. Rule 3-6 lists non-exhaustive examples of
10 circumstances supporting a finding of good cause, including a claim construction by the Court
11 different from that proposed by the party seeking amendment. Here, good cause exists because Icon
12 and Specialized are amending their contentions in view of the Court's constructions of disputed
13 claim terms, as set forth in the Court’s April 16, 2014 order.

14 Icon and Specialized have already exchanged their proposed Amended Contentions. Neither
15 Icon nor Specialized is unduly prejudiced by the amendments to the Contentions.

16
17
18 **IT IS SO STIPULATED.**

19 Dated: By: _____
20 Raymond P. Niro
21 Frederick C. Laney
22 Ashley E. Lavalley
23 NIRO, HALLER & NIRO
24 Attorneys for ICON-IP PTY, LTD.

25 Dated: By: _____
26 Darrell L. Olson
27 Benjamin J. Everton
28 KNOBBE, MARTENS, OLSON & BEAR, LLP
Attorneys for SPECIALIZED BICYCLE
COMPONENTS, INC.

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[PROPOSED] ORDER

Having reviewed the Stipulation filed by the parties pursuant to Local Rule 7-1, and finding that good cause exists pursuant to N.D. Cal. Patent L.R. 3-6 to amend the Invalidity Contentions of Specialized Bicycle Components, Inc. and to amend the Infringement Contentions of Icon-IP Pty Ltd.,

IT IS HEREBY ORDERED that Specialized Bicycle Components, Inc. is allowed to amend its Invalidity Contentions, as set forth in Specialized's Amended Invalidity Contentions, and Icon-IP Pty Ltd. is allowed to amend its Infringement Contentions, as set forth in Plaintiff's Second Amended L.P.R. 3.1 Disclosure of Asserted Claims and Infringement Contentions.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 6, 2014

By: _____
The Honorable
UNITED STATES



1 **FILER'S ATTESTATION**

2 Pursuant to Civil Local Rule 5-1(i) regarding signatures, I, Benjamin J. Everton, attest that
3 concurrence in the filing of this document has been obtained from each of the other signatories. I
4 declare under penalty of perjury under the laws of the United States of America that the foregoing is
5 true and correct.

6
7 Dated: June 5, 2014

By: /s/Darrell L. Olson
8 Darrell L. Olson
9 KNOBBE, MARTENS, OLSON & BEAR, LLP
10 Attorneys for Defendant SPECIALIZED
11 BICYCLE COMPONENTS, INC.

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