

E-FILED: May 9, 2013

(SEE SIGNATURE PAGE FOR ATTORNEY LIST)

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

DROPLETS, INC.
Plaintiffs,
v.
WILLIAMS-SONOMA, INC.,
Defendant.

Case No. 3:12-CV-04047 EJD
Related Case Nos.
5:12-cv-03733 EJD; 3:12-cv-04049 EJD

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING PRODUCTION OF
SETTLEMENT AND LICENSE
AGREEMENTS**

DROPLETS, INC.
Plaintiffs,
v.
YAHOO, INC.,
Defendant.

DROPLETS, INC.
Plaintiffs,
v.
NORDSTROM, INC.,
Defendant.

1 WHEREAS, Defendant Williams-Sonoma, Inc. (“Williams-Sonoma”) has requested that
2 Plaintiff Droplets, Inc. (“Droplets”) produce to it all settlement and license agreements relating to U.S.
3 Patent Nos. 6,687,745 and 7,853,881 (the “patents-in-suit”);

4 WHEREAS, Droplets has represented that it needs a Court Order to produce the requested
5 settlement and license agreements in order to satisfy confidentiality agreements with third parties;

6 WHEREAS, during the March 7, 2013 Case Management Conference in this action, Williams-
7 Sonoma requested such an order from Court, and Droplets did not object to Williams-Sonoma’s
8 request;

9 WHEREAS, during the March 7, 2013 Case Management Conference in this action, the Court
10 directed the parties to submit a proposed order regarding Droplets’ production of settlement and
11 license agreements;

12 NOW, THEREFORE, Williams-Sonoma and Droplets stipulate and agree as follows:

13 1. Pursuant to Federal Rules of Civil Procedure 26 and 34, and upon entry of the attached
14 Proposed Order, Droplets will produce to Williams-Sonoma copies of any settlement or license
15 agreements related to the patents-in-suit on or before May 24, 2013.

16 2. To the extent necessary, the settlement and license agreements shall be produced as
17 HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Protective Order entered
18 in this case (Dkt. No. 49.)

19 3. Williams-Sonoma and Droplets request that this stipulation and order be approved by
20 the Court.

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1 **SO STIPULATED.**

2 DATED: May 8, 2013

By: /s/ Josh W. Budwin

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Attorneys for Defendant Williams-Sonoma, Inc.

Filer's Attestation

Pursuant to Civil Local Rule 5-1(i)(3), Robert Artuz, hereby attests that the above-named signatories concur in this filing.

DATED: May 8, 2013

/s/ Robert J. Artuz
Robert J. Artuz

ORDER

Pursuant to the stipulation set forth above, and for good cause shown, IT IS HEREBY ORDERED that:

1. Pursuant to Federal Rules of Civil Procedure 26 and 34, the Court hereby Orders Droplets to produce copies of all settlement and license agreements related to the patents-in-suit on or before May 24, 2013.

2. To the extent necessary, the settlement and license agreements shall be produced as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY pursuant to the Protective Order entered in this case (Dkt. No. 49.)

DATED: May 9, 2013


~~The Honorable Edward J. Davila
United States District Judge~~

The Honorable Howard R. Lloyd
United States Magistrate Judge