

1 I. NEEL CHATTERJEE (SBN 173985)
 nchatterjee@orrick.com
 2 WILLIAM H. WRIGHT (SBN 161580)
 wwright@orrick.com
 3 ROBERT J. BENSON (SBN 155971)
 rbenson@orrick.com
 4 VICKIE L. FEEMAN (SBN 177487)
 vfeeman@orrick.com
 5 ORRICK, HERRINGTON & SUTCLIFFE LLP
 1000 Marsh Road
 6 Menlo Park, California 94025
 Telephone: +1-650-614-7400
 7 Facsimile: +1-650-614-7401

GEORGE A. RILEY (SBN 118304)
 griley@omm.com
 MARK E. MILLER (SBN 130200)
 markmiller@omm.com
 MICHAEL SAPOZNIKOW (SBN 242640)
 ELIZABETH OFFEN-BROWN
 (SBN 279077)
 eoffenbrown@omm.com
 O'MELVENY & MYERS LLP
 Two Embarcadero Center, 28th Floor
 San Francisco, CA 94111
 Telephone: 1+(415) 984-8700
 Facsimile: 1+(415) 984-8701

8 DOUGLAS E. LUMISH (SBN 183863)
 dlumish@kasowitz.com
 9 JEFFREY G. HOMRIG (SBN 215890)
 jhomrig@kasowitz.com
 10 GABRIEL S. GROSS (SBN 254672)
 ggross@kasowitz.com
 11 JOSEPH H. LEE (SBN 248046)
 jlee@kasowitz.com
 12 KASOWITZ, BENSON, TORRES &
 FRIEDMAN LLP
 13 333 Twin Dolphin Drive, Suite 200
 Redwood Shores, CA 94065
 14 Telephone: 1+(650) 453-5170
 Facsimile: 1+(650) 453-5171

Attorneys for Defendant and Counter-Plaintiff
 MENTOR GRAPHICS CORPORATION

15 Attorneys for Plaintiffs
 16 SYNOPSISYS, INC., EMULATION
 VERIFICATION
 17 ENGINEERING S.A. and EVE-USA, INC.

18 UNITED STATES DISTRICT COURT
 19 NORTHERN DISTRICT OF CALIFORNIA
 20 SAN FRANCISCO DIVISION

22 SYNOPSISYS, INC., EMULATION
 VERIFICATION ENGINEERING S.A. AND
 23 EVE-USA, INC.,
 24 Plaintiffs,
 25 v.
 26 MENTOR GRAPHICS CORPORATION,
 27 Defendant.

Case No. 3:12-cv-05025-MMC

**STIPULATION AND ~~PROPOSED~~
 ORDER TO FILE PORTIONS OF
 DOCUMENT UNDER SEAL
 PURSUANT TO CIVIL LOCAL RULE
 79-5**

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STIPULATION

Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiffs Synopsys, Inc., EVE-USA, Inc. (“EVE-USA”), and Emulation and Verification Engineering, S.A. (“EVE S.A.”) and Defendant Mentor Graphics Corp. (“Mentor Graphics”) jointly submit this stipulation regarding Plaintiffs’ Administrative Motion to File Portions of Documents Under Seal Pursuant to Civil Local Rule 79-5. The parties request that the Court approve the Stipulation and enter the proposed order allowing Plaintiffs to file under seal portions of Plaintiffs’ Answer to Mentor Graphics Corporation’s Counterclaims (“Plaintiffs’ Answer”).

Although counsel for Mentor Graphics Corporation has not reviewed Plaintiffs’ Answer, Plaintiffs have represented that portions of Plaintiffs’ Answer quote from and/or refer to the confidential terms of the same 2006 settlement agreement between EVE-USA, EVE S.A., and Mentor Graphics Corporation that was filed under seal as Exhibit A to Defendant Mentor Graphics Corporation’s Answer to Complaint for Declaratory and Injunctive Relief and Counterclaims. This agreement requires the parties to keep the non-public aspects of the agreement confidential. *See* Exhibit A to Defendant Mentor Graphics Corporation’s Answer to Complaint for Declaratory and Injunctive Relief and Counterclaims. Mentor Graphics agrees that the parties have a duty to maintain the confidentiality of the terms of the 2006 settlement agreement and relies on Plaintiffs’ representations as to the content of Plaintiffs’ Answer for purposes of this stipulation.

1 NOW, THEREFORE, the Parties hereby STIPULATE and REQUEST the Court to place
2 portions of Plaintiffs' Answer to Mentor Graphics Corporation's Counterclaims under seal in the
3 files and records of the Court until further order of the Court.¹

4 Dated: February 4, 2013

ORRICK, HERRINGTON & SUTCLIFFE LLP

6 By: /s/ Vickie L. Feeman

VICKIE L. FEEMAN
Attorneys for Plaintiffs
SYNOPSIS, INC., EMULATION
VERIFICATION ENGINEERING S.A.
AND EVE-USA, INC.

10 Dated: February 4, 2013

O'MELVENY & MEYERS LLP

12 By: /s/ Elizabeth Offen-Brown

ELIZABETH OFFEN-BROWN
Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

15 Pursuant to Civil Local Rule 5-1(i)(3), counsel for Plaintiffs has obtained the concurrence
16 of Mentor Graphics Corporation's counsel in the filing of this Stipulated Request.

17 Dated: February 4, 2013


ORRICK, HERRINGTON & SUTCLIFFE LLP

19 By: /s/ Vickie L. Feeman

VICKIE L. FEEMAN
Attorneys for Plaintiffs
SYNOPSIS, INC., EMULATION
VERIFICATION ENGINEERING S.A.
AND EVE-USA, INC.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

25 DATED: February 7, 2013

26 
Honorable Maxine M. Chesney
United States District Judge

28 ¹ Paragraphs 7 and 7 of Plaintiffs' Answer correspond to paragraphs 7 and 7 of Counts II and III
of Mentor's Counterclaims.