

1 John B. Sullivan (State Bar No. 96742)  
 jbs@severson.com  
 2 Harold R. Jones (State Bar No. 209266)  
 hrj@severson.com  
 3 SEVERSON & WERSON  
 A Professional Corporation  
 4 One Embarcadero Center, Suite 2600  
 San Francisco, California 94111  
 5 Telephone: (415) 398-3344  
 Facsimile: (415) 956-0439  
 6 (additional counsel listed on signature page)

James L. Weinberg  
 (Admitted *Pro Hac Vice*)  
 jweinberg@ulmer.com  
 Thomas L. Anastos  
 (Admitted *Pro Hac Vice*)  
 tansastos@ulmer.com  
 ULMER & BERNE LLP  
 1660 West 2nd Street, Suite 1100  
 Cleveland, Ohio 44113-1448  
 Telephone: (216) 583-7000  
 Facsimile: (216) 583-7001

7 Attorneys for Defendants and Counter-  
 Claimants  
 8 FLEXTRONICS INTERNATIONAL LTD. AND  
 POWER SYSTEMS TECHNOLOGIES LTD.  
 9

10 DANIEL J. BERGESON, Bar No. 105439  
 dbergeson@be-law.com  
 11 JAIDEEP VENKATESAN, Bar No. 211386  
 jvenkatesan@be-law.com  
 12 KYUNG M. LEE, Bar No. 262128  
 klee@be-law.com  
 13 BERGESON, LLP  
 303 Almaden Boulevard, Suite 500  
 San Jose, CA 95110-2712  
 14 Telephone: (408) 291-6200  
 15 Facsimile: (408) 297-6000  
 16

ANDREWS KURTH LLP  
 Frederick S. Frei (*Pro Hac Vice*)  
 frederickfrei@andrewskurth.com  
 Sean S. Wooden (*Pro Hac Vice*)  
 seanwooden@andrewskurth.com  
 Leasa Woods Anderson (*Pro Hac Vice*)  
 leasaanderson@andrewskurth.com  
 1350 I Street NW, Suite 1100  
 Washington, DC 20005  
 Telephone: (202) 662-2700  
 Facsimile: (202) 662-2739

17 Counsel for Plaintiff/Counter-Defendant  
 SKYNET ELECTRONIC CO., LTD.  
 18

19 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION**

20 SKYNET ELECTRONIC CO. LTD.,

21 Plaintiff,

22 v.

23 FLEXTRONICS INTERNATIONAL LTD. *et*  
 24 *al.*

25 Defendants.

26 AND RELATED COUNTERCLAIMS  
 27

Case No. CV12-06317 WHA

**STIPULATION AND [PROPOSED]  
 ORDER FOR AN EXTENSION OF TIME  
 TO RESPOND TO SECOND AMENDED  
 COMPLAINT**

Judge: William A. Alsup  
 Courtroom 8, 19th Floor

Case Filed: December 12, 2012  
 Trial Date: September 8, 2014

1 Pursuant to Civil Local Rules 6-2, 7-12, and related rules, Plaintiff Skynet Electronic Co.,  
2 Ltd. (“Skynet”) and Defendants Flextronics International, Ltd. (“Flextronics”) and Power  
3 Systems Technologies Ltd. (“Power Systems”) (collectively, “Defendants”) hereby stipulate  
4 through their respective counsel of record as follows:

5 1. Plaintiff Skynet filed its Second Amended Complaint on July 3, 2013. The  
6 Second Amended Complaint names Defendants Flextronics and Power Systems.

7 2. Inasmuch as the parties have agreed that an orderly schedule for any response to  
8 the Second Amended Complaint would be efficient for the parties and for the Court, Defendants  
9 Flextronics and Power Systems shall, as permitted by Federal Rule of Civil Procedure 12,  
10 answer, move or otherwise plead in response to the Second Amended complaint in the above-  
11 captioned action no later than July 31, 2013. The parties agree to confer before said date and to  
12 request the Court to enter an appropriate order if additional response time is needed.

13 3. Plaintiff Skynet and Defendants further stipulate and agree that entry into this  
14 stipulation by the Defendants shall not constitute a waiver of any jurisdictional or other defenses  
15 that may be available under Rule 12 of the Federal Rules of Civil Procedure, a waiver of any  
16 affirmative defenses under Rule 8 of the Federal Rules of Civil Procedure, or a waiver of any  
17 other statutory or common law defenses that may be available to the Defendants collectively or  
18 individually. Defendants expressly reserve their rights to raise any such defenses in response to  
19 either the current Second Amended Complaint or any amended pleading that may be filed  
20 relating to this action.

21 4. The time for Flextronics to respond to Skynet’s Amended Complaint was  
22 previously extended from January 7, 2013 to January 31, 2013. The deadline for filing requests  
23 for leave to file pleading amendments was previously modified from June 28, 2013 to August 27,  
24 2013. There have been no other extensions of time in this matter.

25 5. No case management deadlines will be affected by this stipulation.

26 X

1 STIPULATED TO AND APPROVED BY:

2 DATED: July 10, 2013

/s/ Harold R. Jones

John B. Sullivan (CSB No. 96742)

Harold R. Jones (CSB No. 209266)

Eric J. Gribbin (CSB No. 205877)

egribbin@ulmer.com

ULMER & BERNE LLP

500 W. Madison Street, Suite 3600

Chicago, IL 60661-4587

Telephone: (312) 658-6546

Facsimile: (312) 658-6547

James L. Weinberg

(Admitted *Pro Hac Vice*)

jweinberg@ulmer.com

Thomas L. Anastos

(Admitted *Pro Hac Vice*)

tanastos@ulmer.com

ULMER & BERNE LLP

1660 West 2nd Street, Suite 1100

Cleveland, Ohio 44113-1448

Telephone: (216) 583-7000

Facsimile: (216) 583-7001

*Attorneys for Defendants and Counter-  
Claimants Flextronics International, Ltd. and  
Power Systems Technologies, Ltd.*

1 In accordance with Civil Local Rule 5-1(i)(3), the above signatory attests that  
2 concurrence in the signing of this document has been obtained from the signatory below.

3  
4 DATED: July 10, 2013

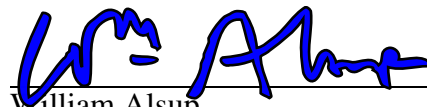
/s/ Jaideep Venkatesan  
BERGESON, LLP  
Daniel J. Bergeson  
Jaideep Venkatesan  
Kyung M. Lee  
303 Almaden Blvd., Suite 500  
San Jose, CA 95110-2712  
Telephone: (408) 291-6200  
Facsimile: (408) 297-6000

9 ANDREWS KURTH LLP  
Frederick S. Frei  
(Admitted *Pro Hac Vice*)  
frederickfrei@andrewskurth.com  
Leasa Woods Anderson  
(Admitted *Pro Hac Vice*)  
leasaanderson@andrewskurth.com  
1350 I Street NW, Suite 1100  
Washington, DC 20005  
Telephone: (202) 662-2700  
Facsimile: (202) 662-2739

15 *Attorneys for Plaintiff*  
*Skynet Electronic Co., Ltd.*

19 IT IS SO ORDERED

20  
21 Dated: July 10, 2013

  
\_\_\_\_\_  
William Alsup  
United States District Judge