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Attorneys for Defendant
 MENTOR GRAPHICS CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT CALIFORNIA - SAN FRANCISCO DIVISION

26 SYNOPSIS, INC., a Delaware Corporation,)
 27)
 28 Plaintiff,)
 vs.)
 MENTOR GRAPHICS CORPORATION, an)
 Oregon Corporation,)
 Defendant.)

Case No. 3:12-cv-06467-MMC (DMR)
**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING SOURCE CODE
 PRODUCED BY MENTOR GRAPHICS
 CORPORATION**

1 WHEREAS, Plaintiff Synopsys, Inc. (“Synopsys”) and Defendant Mentor Graphics
2 Corporation (“Mentor Graphics”) are presently engaged in pretrial discovery, including discovery
3 regarding source code for the accused Mentor Graphics Veloce and Precision products;

4 WHEREAS, pursuant to an agreement between the parties, Mentor created a “cheat sheet”
5 containing information for representative Veloce or Precision products dating from December 21,
6 2006, to June 6, 2013, which was served on Synopsys as Exhibit A to Mentor’s Second
7 Supplemental Response to Synopsys Interrogatory No. 9;

8 WHEREAS, for each such representative Veloce or Precision product, the “cheat sheet”
9 identifies the product name, the release number, the approximate release date, and a source code
10 repository “tag” for a representative version of RTL source code corresponding to such release;

11 IT IS, THEREFORE, AGREED AND STIPULATED, AS FOLLOWS:

12 1. Mentor Graphics will not argue that any differences between the representative
13 RTL identified for a particular release of a Precision or Veloce product and other versions of
14 RTL are material to Synopsys’ analyses for infringement by the accused products, and

15 2. Mentor Graphics will not argue that any differences between (a) the releases of a
16 Veloce or Precision product identified in the “cheat sheet,” and (b) releases of a Veloce or
17 Precision product not identified in the “cheat sheet,” are material to Synopsys’ analyses for
18 infringement by the accused products.

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Respectfully submitted,

Dated: July 1, 2014

By: /s/ Philip W. Woo
Philip W. Woo

Attorneys for Plaintiff
SYNOPSIS, INC.

Dated: July 1, 2014

By: /s/ Andy Mason
Andy Mason

Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 2, 2014



DONNA M. RYU
United States Magistrate Judge

Pursuant to Civil Local Rule 5-1(i)(3), counsel for Synopsys has obtained the concurrence of Defendant's counsel in the filing of this stipulation.

Dated: July 1, 2014

By: /s/ Philip W. Woo
Philip W. Woo

Attorneys for Plaintiff
SYNOPSIS, INC., a Delaware Corporation