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MENTOR GRAPHICS CORPORATION

24 **UNITED STATES DISTRICT COURT**  
25 **NORTHERN DISTRICT OF CALIFORNIA**  
26 **SAN FRANCISCO DIVISION**

27 SYNOPSISYS, INC., a Delaware  
28 Corporation

Plaintiff,

v.

MENTOR GRAPHICS CORPORATION,  
an Oregon Corporation,

Defendant.

Case No. 3:12-cv-06467-MMC

**STIPULATION AND [PROPOSED]  
ORDER TO TAKE DEPOSITIONS  
AFTER THE CLOSE OF FACT  
DISCOVERY**

STIPULATION AND [PROPOSED] ORDER TO TAKE  
DEPOSITIONS AFTER THE CLOSE OF FACT DISCOVERY  
CASE NO. 3:12-CV-06467-MMC

1 IT IS HEREBY STIPULATED by and between Plaintiff Synopsys, Inc.  
2 (“Synopsys”) and Defendant Mentor Graphics Corp. (“Mentor Graphics”) as follows:

3 WHEREAS, Federal Rule of Civil Procedure 29 provides that the Parties may  
4 stipulate to extend discovery;

5 WHEREAS, Federal Rule of Civil Procedure 29(b) provides that Court  
6 approval is required to extend discovery, even where the Parties have stipulated to  
7 the extension;

8 WHEREAS, fact discovery in this case closes on July 18, 2014 (Dkt. No. 145);

9 WHEREAS, the Parties desire to take the deposition of certain identified  
10 witnesses after the close of fact discovery due to witness availability and/or attorney  
11 availability;

12 WHEREAS, good cause exists for allowing the Parties to take the desired  
13 depositions;

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

15 1. Parties have agreed to the below schedule to depose the listed witnesses  
16 after the close of fact discovery:

17

Deponent	Deposition Date
Thomas Delaye	July 22, 2014
Bob Erickson	July 22, 2014
Meera Srinivasan	July 24, 2014
Brent Gregory, Rule 30(b)(6) Topics 5, 11(b), 46, 47, and 50	July 25, 2014 <sup>1</sup>
Praveen Devulapalli	July 31, 2014
Angela Sutton	July 31, 2014
Aart de Geus	August 5, 2014 <sup>2</sup>

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27 <sup>1</sup> The Parties have agreed that this deposition will be limited to two hours on the  
28 record.

1 The last fact deposition currently scheduled will occur on August 5, 2014.

2           2.       The Parties have agreed that the witnesses disclosed in the Parties'  
3 Initial Disclosures for the first time on or after July 10, 2014 will be made available  
4 for deposition after the close of fact discovery, provided the request for deposition is  
5 made before the close of fact discovery.

6           3.       The Parties have agreed that any motions to compel relating to any  
7 deposition in the above table shall be due one week (seven calendar days) following  
8 the deposition. (See L.R. 37-3.)

9 IT IS SO STIPULATED.

10           Dated: July 18, 2014

11           By: /s/ Salumeh R. Loesch  
              Salumeh R. Loesch

12                                   Attorneys for Defendant  
13                                   MENTOR GRAPHICS CORPORATION

14           Dated: July 18, 2014

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

16                                   Attorneys for Plaintiff  
17                                   SYNOPSIS, INC.

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19  
20           Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that  
21 concurrence in the filing of this document has been obtained from the other  
22 signatory above.

23  
24           Dated: July 18 2014


25           By: /s/ Salumeh R. Loesch  
              Salumeh R. Loesch

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27           <sup>2</sup> The Parties have agreed that this deposition will be limited to two hours on the  
28 record.

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

DATED: July 21, 2014

  
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Honorable Maxine M. Chesley  
United States District Judge