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Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **SAN FRANCISCO DIVISION**

23 SYNOPSIS, INC., a Delaware
24 Corporation

25 Plaintiff,

26 v.

26 MENTOR GRAPHICS CORPORATION,
27 an Oregon Corporation,

28 Defendant.

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

**SECOND STIPULATION AND
[PROPOSED] ORDER
EXTENDING DEADLINE TO FILE
MOTION TO COMPEL
DISCOVERY**

SECOND STIPULATION AND [PROPOSED] ORDER
EXTENDING THE DEADLINE TO FILE MOTION TO COMPEL
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, pursuant to Civil Local Rule 37-3 the last day to file a motion to
9 compel discovery is July 25, 2014;

10 WHEREAS, the Parties filed a stipulation (Dkt. No. 208) and the Court
11 Ordered an extension of the deadlines on which to file a motion to compel discovery
12 to August 1 (Dkt. No. 211);

13 WHEREAS, the Parties still are continuing to discuss issues and believe there
14 are some disputes that may be resolved through further supplementation and/or
15 cooperation;

16 WHEREAS, good cause exists for allowing the Parties to extend the deadline
17 on which to file a motion to compel discovery for these issues;

18 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby
19 stipulate to extend the deadline on which to file a motion to compel discovery to
20 August 5, 2014, as to the following discovery disputes:

- 21 1. Mentor’s responses to Synopsys’ Requests For Admission Nos. 49, 53,
22 60, 71, 72, and 94-118;
- 23 2. Mentor’s responses to Synopsys’ Interrogatory Nos. 15, 24, 31, and 36;
- 24 3. Synopsys’ responses to Mentor’s Requests For Admission Nos. 27, 33-
25 36, 45-58, 62-65, 70-72, 75-76, 87-88, 92, 101-02, and 104-05;
- 26 4. Mentor’s challenges to certain of Synopsys’ documents designated
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“Highly Confidential – Attorneys’ Eyes Only,” detailed in counsel for Mentor’s July 15, 2014 letter to counsel for Synopsys;

- 5. Mentor’s request for the deposition of Kevin Kranen;
- 6. The parties’ follow-up requests as to various documents and information requested to be produced related to alleged “damages” issues, per the parties’ correspondence from July 16-18, 2014; and
- 7. Mentor’s follow-up request to produce document retention/destruction policies, pursuant to the July 25, 2014 deposition of Brent Gregory.

AND, the Parties further stipulate to extend the deadline on which to file a motion to compel discovery to August 8, 2014, as to the following discovery disputes:

- 1. Mentor’s challenges to Synopsys’ privilege log, detailed in counsel for Mentor’s July 18, 2014 letter to counsel for Synopsys.

1 IT IS SO STIPULATED.

2 Dated: August 1, 2014

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

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4 Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

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6 Dated: August 1, 2014

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

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8 Attorneys for Plaintiff
SYNOPSIS, INC.


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11 Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that
12 concurrence in the filing of this document has been obtained from the other
13 signatory above.
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16 Dated: August 1, 2014

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

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18 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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21 DATED: August 1, 2014



Honorable Maxine M. Chesley
United States District Judge

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28 SECOND STIPULATION AND [PROPOSED] ORDER
EXTENDING THE DEADLINE TO FILE MOTION TO COMPEL
DISCOVERY CASE NO. 3:12-CV-06467-MMC