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Attorneys for Defendant
 MENTOR GRAPHICS CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT CALIFORNIA - SAN FRANCISCO DIVISION

20 SYNOPSIS, INC., a Delaware Corporation,)
 21)
 22 Plaintiff,)
 23 vs.)
 24 MENTOR GRAPHICS CORPORATION, an)
 25 Oregon Corporation,)
 26 Defendant.)

Case No. 3:12-cv-06467-MMC (DMR)
STIPULATION AND ~~PROPOSED~~
ORDER REGARDING SYNOPSIS, INC.'S
PRODUCTS

1 Pursuant to Civil Local Rule 7-12 and Local Patent Rule 3-6, Plaintiff Synopsys, Inc.
2 (“Synopsys”) and Defendant Mentor Graphics Corporation (“Mentor Graphics”) jointly submit this
3 stipulated motion.

4 WHEREAS, Synopsys identified a total of 26 asserted claims of U.S. Patent No. 5,530,841
5 (the “‘841 patent”), U.S. Patent No. 5,680,318 (the “‘318 patent”), U.S. Patent No. 5,748,488 (the
6 “‘488 patent”),¹ and U.S. Patent No. 6,836,420 (the “‘420 patent”) (collectively, the “Asserted
7 Patents”) in its Infringement Contentions served on April 12, 2013 in this case;

8 WHEREAS, Mentor Graphics identified 39 prior art references and products for the
9 Gregory patents, and 31 prior art references and products for the ‘420 patent in its First Amended
10 Invalidation Contentions served January 29, 2014 in this case;

11 WHEREAS, the Court has stayed “all proceeding on the ‘420 patent pending completion of
12 trial on *inter partes* review of said patent by the Patent Trial and Appeals Board” (Dkt. No. 215);

13 WHEREAS, Synopsys and Mentor Graphics seek to further streamline and narrow the
14 issues in the case as it moves forward;

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

16 By August 7, 2014 Synopsys will elect 8 claims total for the Gregory patents.

17 By August 14, 2014 Mentor will elect 6 prior art references for the Gregory patents.

18 For purposes of this Stipulation, a prior art instrumentality (such as a device or process)
19 and associated references that describe that prior art instrumentality shall count as one prior art
20 reference, as shall the closely related work of a single prior artist.

21
22 Respectfully submitted,

23
24 Dated: August 7, 2014

By: /s/ Philip W. Woo

Philip W. Woo

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26 Attorneys for Plaintiff
SYNOPSYS, INC.

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28 ¹ The ‘841, ‘318, and ‘488 patents are related, have the same inventors (Brent L. Gregory and Russell B. Segal), and are collectively referred to as the “Gregory patents.”

1 Dated: August 7, 2014

By: /s/ Andy Mason
Andy Mason

Attorneys for Defendant
MENTOR GRAPHICS CORPORATION

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

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8 Dated: August 7, 2014

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

Attorneys for Plaintiff
SYNOPSYS, INC.

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13 PURSUANT TO STIPULATION, IT IS SO ORDERED.



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15 Dated: August 8, 2014

DONNA M. RYU
United States Magistrate Judge

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