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67 Attorneys for Defendant
 68 MENTOR GRAPHICS CORPORATION

69 **UNITED STATES DISTRICT COURT**
 70 **NORTHERN DISTRICT OF CALIFORNIA**
 71 **SAN FRANCISCO DIVISION**

72 SYNOPSYS, INC., a Delaware Corporation

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

74 Plaintiff,

75 **STIPULATION AND [PROPOSED]**
 76 **ORDER TO PERMIT FILING A**
 77 **REVISED EXHIBIT A TO THE**
 78 **PARTIES' JOINT CLAIM**
 79 **CONSTRUCTION STATEMENT**

80 v.

81 MENTOR GRAPHICS CORPORATION, an
 82 Oregon Corporation,

83 Defendant.

84 STIPULATION AND [PROPOSED] ORDER TO PERMIT FILING
 85 OF A REVISED JOINT CLAIM CONSTRUCTION STATEMENT
 86 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, pursuant to the April 1, 2013 Pretrial Preparation Order (Dkt.
4 36) and Patent L.R. 4-4, on August 5, 2013 the parties filed a Joint Claim
5 Construction and Prehearing Statement (Dkt. 49) (“JCCPS”), along with a chart
6 summarizing the parties proposed constructions and supporting evidence, which was
7 attached as Exhibit A to the JCCPS (Dkt. 49-1);

8 WHEREAS, during the course of claim construction discovery, the parties
9 have clarified the issues to resolve through claim construction and now wish to file a
10 Revised Exhibit A to the JCCPS (attached as Exhibit 1 to this motion) to reflect the
11 Parties’ current proposed claim constructions and also to provide cross-citations to
12 the patents-in-suit so that the Parties’ supporting evidence may be more easily
13 compared;

14 WHEREAS, good cause exists for filing the Revised Exhibit A because that
15 Revised Exhibit A (i) better facilitates resolution of the claim construction disputes
16 as it reflects the parties’ current proposed constructions; and (ii) will simplify
17 comparison of the evidence cited by the Parties in support of their respective
18 constructions;

19 WHEREAS, filing the Revised Exhibit A will not affect any scheduled dates or
20 events in this action.

21 NOW, THEREFORE, pursuant to Civil Local Rule 7-12 and Paragraph 6 of
22 this Court’s Standing Order, the parties hereby stipulate to the filing of the Revised
23 Exhibit A to the JCCPS.

1 IT IS SO STIPULATED.

2 Dated: September 19, 2013

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15 By: /s/ Andrew M. Mason
16 Andrew M. Mason

17 Attorneys for Defendant
18 MENTOR GRAPHICS CORPORATION

19 Dated: September 19, 2013

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

Dated: September 19, 2013

By: /s/ Andrew M. Mason
Andrew M. Mason

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 24, 2013



Honorable Maxine M. Chesney
United States District Judge