1 2	Jeff D. Friedman (173886) HAGENS BERMAN SOBOL SHAPIRO LLP 715 Hearst Avenue, Suite 202	Steve W. Berman (Pro Hac Vice) Andrew M. Volk (Pro Hac Vice) Mark S. Carlson (Pro Hac Vice)		
3	Berkeley, CA 94710 Telephone: (510) 725-3000	HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300		
4	Facsimile: (510) 725-3001 jefff@hbsslaw.com	Seattle, WA 98101 Telephone: (206) 623-7292		
5		Facsimile: (206) 623-0594 steve@hbsslaw.com		
6		andrew@hbsslaw.com		
7		markc@hbsslaw.com		
8	ATTORNEYS FOR PLAINTIFF BRIXHAM SOLUTIONS LTD.			
9	Jonathan S. Kagan (166039)	Rebecca L. Clifford (254105)		
10	IRELL & MANELLA LLP	Nima Hefazi (272816)		
11	11800 Avenue of the Stars, Suite 900 Los Angeles, CA 90067-4276IRELL & MANELLA LLP 840 Newport Center Drive, Suite			
12	Telephone: (310) 277-1010	Newport Beach, CA 92660		
13	Facsimile: (310) 203-7199 jkagan@irell.com	Telephone: (949) 760-0991 Facsimile: (949) 760-5200		
	JKaganenen.com	rclifford@irell.com		
14		nhefazi@irell.com		
15	ATTORNEYS FOR DEFENDANT JUNIPER NETWORKS, INC.			
16	IN THE UNITED STATES DISTRICT COURT			
17	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
18	SAN FRANCISCO DIVISION			
19	BRIXHAM SOLUTIONS LTD., a British Virgin) Islands International Business Company,	Civil Action No. C:13-00616-JCS		
20) Plaintiff,)	JOINT STIPULATION AND		
21)	[PROPOSED] ORDER REGARDING		
22	v.)	REDUCTION OF CLAIMS AND PRIOR ART		
23	JUNIPER NETWORKS, INC., a Delaware)corporation,)			
24) Defendant.)			
25)			
26	,			
27				
28				
	JOINT STIPULATION AND [PROPOSED] ORDER RE: REDUCTION OF CLAIMS AND PRIOR ART 005010-11 607589 V1	Case No. 13-00616-JCS		
		Dockets.Justia		

2	Order (Dkt. 26), plaintiff Brixham Solutions Ltd. ("Brixham") and Defendant Juniper Networks,			
3	Inc. ("Juniper") hereby submit the following stipulation regarding reduction of claims and prior art			
4	in the above-mentioned case:			
5	1. Brixham shall reduce its asserted claims from 142 to 40 or less in its Infringement			
6	Contentions due on July 22, 2013. Brixham shall reduce the number of asserted claims further by			
7	October 30, 2013, and further still within two weeks after the Court enters its claim construction			
8	order.			
9	2. Juniper shall reduce the number of prior art references it may assert in its invalidity			
10	contentions due on October 7, 2013. Juniper shall further reduce the number of prior art references			
11	by December 2, 2013, and further still within four weeks after the Court enters its claim			
12	construction order.			
13	3. After Juniper has had a chance to review the particular claims asserted by Brixham			
14	on July 22, 2013, the parties will meet and confer regarding the appropriate limits on the number of			
15	asserted claims and prior art references at each of the stages discussed above. When the parties			
16	submit the Updated Case Management Conference Statement on August 23, 2013 (in connection			
17	with the August 30, 2013 Case Management Conference), the parties will propose numerical limits			
18	for each of these subsequent stages.			
19				
20				
21				
22	Dated: July 16, 2013 HAGENS BERMAN SOBOL SHAPIRO LLP			
23				
24	/s/Steve W. Berman Steve W. Berman (pro hac vice)			
25	Andrew M. Volk (pro hac vice) Mark S. Carlson (pro hac vice)			
26				
27	Attorneys for Plaintiff Brixham Solutions LTD.			
28				
	JOINT STIPULATION AND [PROPOSED] ORDER RE: REDUCTION OF CLAIMS AND PRIOR ART - 1 - Case No. 13-00616-JCS 005010-11 607589 V1			

Pursuant to paragraph 4(b) of this Court's May 23, 2013 Case Management and Pretrial

1

1	Dated: July 16, 2013	IRELL & MANELLA LLP	
2		/Rebecca L. Clifford	
3		Jonathan S. Kagan Rebecca L. Clifford	
4		Nima Hefazi	
5		Attorneys for Defendant Juniper Networks, Inc.	
6		Jumper Networks, mc.	
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	JOINT STIPULATION AND [PROPOSED] RE: REDUCTION OF CLAIMS AND PRIC 005010-11 607589 V1	ORDER DRART - 2 -	Case No. 13-00616-JCS

1	ORDER		
2	The above JOINT STIPULATION AND [PROPOSED] ORDER REGARDING		
3	REDUCTION OF CLAIMS AND PRIOR ART is approved and all parties shall comply with its		
4	provisions.		
5	IT IS SO ORDERED.		
6	S C C C N		
7	Dated: July 17, 2013		
8	UNING STATES MAGINTRATE JUDGE		
9	ANDISTRICT OF		
10			
11			
12			
13			
14			
15 16			
10			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	JOINT STIPULATION AND [PROPOSED] ORDER RE: REDUCTION OF CLAIMS AND PRIOR ART - 3 - Case No. 13-00616-JCS 005010-11 607589 V1		