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13 Attorneys for Defendants
 14 LG Electronics, Inc. and
 15 LG Electronics U.S.A., Inc.

16 **IN THE UNITED STATES DISTRICT COURT**
 17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 18 **SAN FRANCISCO DIVISION**

19 BLUESTONE INNOVATIONS LLC,
 20 Plaintiff,
 21 v.
 22 LG ELECTRONICS, INC. et al.,
 23 Defendants.

Case No. 3: 13-cv-01770-SI

STIPULATION AND ~~PROPOSED~~ ORDER
UNDER LOCAL RULE 7-12 TO SERVE
AMENDED PATENT L.R. 3-1
INFRINGEMENT CONTENTIONS

Judge: Honorable Susan Illston
 Courtroom: 10, 19th Floor

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2 IT IS HEREBY STIPULATED BY THE PARTIES, THROUGH THEIR
3 UNDERSIGNED COUNSEL:

4 Pursuant to Civil L.R. 7-12 and Patent L.R. 3-6, Plaintiff Bluestone Innovations, LLC
5 (“Bluestone”) and Defendants LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively
6 “LGE”), by and through their undersigned counsel, hereby consent and stipulate that, with leave of
7 Court, Bluestone may serve amended Patent L.R. 3-1 infringement contentions upon LGE. In support of
8 this stipulation, the parties state as follows:

9 The parties met and conferred about the sufficiency of Bluestone’s infringement claim charts with
10 regards to the last element of claims 1 and 23. Even though Bluestone believes its claim charts
11 sufficiently sets forth its infringement contentions with respect to the last element of claims 1 and 23, in
12 an effort to avoid burdening the Court with a discovery dispute on this issue, Bluestone agrees to
13 supplement its infringement claim charts.

14 By entering into this stipulation, LGE does not waive its right to challenge Bluestone’s use of
15 representative claim charts. Indeed, LGE plans to submit a letter brief shortly after the parties enter into
16 this stipulation asking this Court for relief from Bluestone’s use of representative claim charts. In
17 addition, LGE wants to make clear that this stipulation relates to Bluestone’s procedural compliance with
18 the Patent Local Rule 3-1 requirements. LGE does not waive any right or ground to challenge
19 Bluestone’s contentions on substantive grounds, including that LGE’s accused products do not infringe
20 the patent in suit.

21 For the avoidance of any confusion, LGE’s invalidity contentions shall be served by October 17,
22 2013, as set forth in the parties’ Stipulated Request for Order Changing Time (Dkt. No. 125), regardless
23 of the date by which this Stipulation and Proposed Order is entered and Bluestone serves its amended
24 LPR 3-1 infringement contentions.

25 Accordingly, the parties stipulate that Bluestone may amend its Patent L.R. 3-1 infringement
26 contentions within five days of this Stipulation and Proposed Order.

1 Dated: October10, 2013

NIRO, HALLER, & NIRO

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3 By: /s/ David J. Mahalek

DAVID J. MAHALEK

4 **DAVIS WRIGHT TREMAINE LLP**

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16 Attorneys for Plaintiff

BLUESTONE INNOVATIONS LLC

1 Dated: October 10, 2013

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2 By: /s/ Ashish Nagdev

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14 Attorneys for Defendants
15 LG Electronics, Inc. and
16 LG Electronics U.S.A.,
17 Inc.

18 I, David J. Mahalek, am the ECF User whose identification and password are being used to file this
19 Stipulation Under Local Rule 7-12. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that counsel for the
20 foregoing parties have concurred in this filing.

21 /s/ David J. Mahalek

22 DAVID J. MAHALEK

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 Dated: 10/10/13



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HONORABLE SUSAN ILLSTON
6 UNITED STATES DISTRICT JUDGE
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