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GSI TECHNOLOGY, INC.

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION  
18

19 CYPRESS SEMICONDUCTOR  
CORPORATION,

20 Plaintiff,

21 v.

22 GSI TECHNOLOGY, INC.,

23  
24 Defendant.  
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**CASE NO. 3:13-CV-02013-JST (JCS)**

**STIPULATION AND ~~PROPOSED~~  
ORDER CONCERNING THE PARTIES'  
SUPPLEMENTAL PATENT LOCAL RULE  
CONTENTIONS**

**JURY TRIAL DEMANDED**

1 Pursuant to Local Rules 6-2 and 7-12 of the United States District Court for the Northern  
2 District of California, Defendant GSI Technology, Inc. (“GSI”) and Plaintiff Cypress  
3 Semiconductor Corporation (“Cypress”) stipulate as follows:

4 WHEREAS, pursuant to the Court’s Case Management Order (Dkt 25), the deadline for  
5 Cypress’s Disclosure of Asserted Claims and Preliminary Infringement Contentions and  
6 accompanying production pursuant to Patent Local Rules 3-1 and 3-2 was September 13, 2013;

7 WHEREAS, pursuant to the Case Management Order (Dkt 25), the deadline for GSI’s  
8 Invalidity Contentions and accompanying document production pursuant to Patent Local Rules 3-  
9 3 and 3-4 was November 27, 2013;

10 WHEREAS, pursuant to the Case Management Order (Dkt 25), Cypress and GSI provided  
11 their respective contentions pursuant to the relevant Patent Local Rules on September 13, 2013,  
12 and November 27, 2013, respectively;

13 WHEREAS, Cypress provided amended Infringement Contentions with respect to its  
14 doctrine of equivalents allegations on September 30, 2013;

15 WHEREAS, the Court held a claim construction hearing for United States Patent Nos.  
16 7,142,477 (the “’477 patent) and 6,651,134 (the “’134 patent”), on May 20, 2014;

17 WHEREAS, on July 29, 2014, the Court issued the Order Construing Claims Of U.S.  
18 Patent Nos. 6,651,134 And 7,142,477 (Dkt 114), construing, among others, the term “sending  
19 write data”/“write data is sent across a write path” with respect to the ’477 patent and the terms  
20 “address signal” and “memory” with respect to the ’134 patent;

21 WHEREAS, the parties agreed to exchange supplemental contentions (GSI’s  
22 supplemental invalidity contentions with respect to the ’477 patent and Cypress’s supplemental  
23 infringement contentions with respect to the ’134 patent) on September 19, 2014, in light of the  
24 Court’s construction of certain terms of the ’477 and ’134 patents;

25 WHEREAS, on September 19, 2014, Cypress served GSI with its amended Patent Local  
26 Rule 3-1 infringement contentions with respect to the ’134 patent (“Cypress Amended  
27 Infringement Contentions”) and GSI served Cypress with its amended Patent Local Rule 3-3  
28 invalidity contentions with respect to the ’477 patent (“GSI Amended Invalidity Contentions”);

1 and

2 WHEREAS, the parties agree that the Cypress Amended Infringement Contentions and  
3 the GSI Amended Invalidity Contentions shall be deemed amended pursuant to Patent Local Rule  
4 3-6;

5 IT IS HEREBY AGREED AND STIPULATED by and between the parties, through their  
6 respective counsel and subject to the Court's approval, good cause having been timely shown,  
7 that the Cypress Amended Infringement Contentions and the GSI Amended Invalidity  
8 Contentions shall be deemed appropriately amended pursuant to Patent Local Rule 3-6 and, thus,  
9 are hereby adopted as the parties' respective contentions with respect to the patents addressed in  
10 the amended contentions.

11 Dated: September 30, 2014

Respectfully Submitted,

FISH & RICHARDSON, P.C.

14 By: /s/ David Hoffman, by permission

15 David Hoffman  
16 Attorneys for Plaintiff  
17 CYPRESS SEMICONDUCTOR CORP.

DLA PIPER LLP (US)

19 By: /s/ Michael G. Schwartz

20 Michael G. Schwartz  
21 Attorneys for Defendant  
22 GSI TECHNOLOGY, INC.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24 Dated: October 7, 2014

26 By

  
27 Jon S. Tigar  
28 United States District Judge

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**SIGNATURE ATTESTATION**

I, Michael Schwartz, am the ECF user whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER CONCERNING THE PARTIES' SUPPLEMENTAL PATENT LOCAL RULE CONTENTIONS in compliance with Civil L.R. 6-2 and 7-12. Concurrence to the filing of this document was obtained from David Hoffman, counsel for Cypress Semiconductor Corporation, on September 30, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 30, 2014

DLA PIPER LLP (US)

/s/ Michael G. Schwartz  
Michael G. Schwartz  
Attorneys for Defendant  
GSI TECHNOLOGY, INC.