

KAYE | SCHOLER LLP

1 Michael J. Malecek (SBN 171034)
 michael.malecek@kayescholer.com
 2 Marisa Armanino Williams (SBN 264907)
 marisa.armanino@kayescholer.com
 3 Robert S. Magee (SBN 271443)
 robert.magee@kayescholer.com
 4 KAYE SCHOLER LLP
 Two Palo Alto Square, Suite 400
 5 3000 El Camino Real
 Palo Alto, California 94306
 6 Telephone: (650) 319-4500
 Facsimile: (650) 319-4700

7 Robert R. Laurenzi (NY Reg. No. 3024676)
 8 (*Pro Hac Vice*)
 robert.laurenzi@kayescholer.com
 9 KAYE SCHOLER LLP
 425 Park Avenue
 10 New York, New York 10022-3598202) 783-6040
 Telephone: (212) 836-8000
 11 Facsimile: (212) 836-8999

12 Terence Woodsome (SBN 240908)
 twde@cypress.com
 13 CYPRESS SEMICONDUCTOR CORPORATION
 198 Champion Court
 14 San Jose, California 95134
 Telephone: (408) 544-1035
 15 Facsimile: (408) 456-1821

16 Attorneys for Plaintiff and Counterclaim Defendant
 CYPRESS SEMICONDUCTOR CORPORATION

Robert T. Haslam, III (SBN 71134)
 rhaslam@cov.com
 Anupam Sharma (SBN 229545)
 asharma@cov.com
 Charlin Chia-Ning Lu (SBN 271121)
 clu@cov.com
 Patrick Norton Flynn (SBN 286108)
 pflynn@cov.com
 COVINGTON & BURLING LLP
 333 Twin Dolphin Drive, Suite 700
 Redwood Shores, California 94605
 Telephone: (650) 632-4709
 Facsimile: (650) 632-4800

Attorneys for Defendant and Counterclaim
 Plaintiff SILEGO TECHNOLOGY, INC.

18 **UNITED STATES DISTRICT COURT**
 19 **NORTHERN DISTRICT OF CALIFORNIA**

21 CYPRESS SEMICONDUCTOR
 CORPORATION,
 22
 23 Plaintiff and Counterclaim
 Defendant,

24 v.

25 SILEGO TECHNOLOGY, INC.,
 26
 27 Defendant and
 Counterclaim Plaintiff.

Case No. 3:13-cv-04412-MMC

**STIPULATION AND
 [PROPOSED] ORDER TO
 EXTEND PATENT DISCLOSURE
 DEADLINES**

AND ORDER THEREON

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Cypress Semiconductor
2 Corporation (“Cypress”) and Defendant Silego Technology, Inc. (“Silego”) agree to the
3 following Stipulation and respectfully request that the Court enter an Order as follows:

4 WHEREAS Cypress is currently scheduled to serve its Disclosure of Asserted Claims
5 and Infringement Contentions and accompanying document production on April 25, 2014, and
6 Silego is currently scheduled to serve its Invalidity Contentions and accompanying document
7 production on June 9, 2014 (Dkt. Nos. 33, 35, 38, 40, 42, 44, & 46);

8 WHEREAS the parties are engaged in settlement negotiations, have reached an
9 agreement in principle, and desire additional time to finalize and execute the agreement before
10 the parties must make the required patent disclosures under Patent Local Rules 3-1, 3-2, 3-3,
11 and 3-4;

12 WHEREAS the parties have sought one previous time modification to allow Silego
13 additional time to respond to Cypress’s complaint (Dkt. No. 17) and five previous times
14 modification to allow the parties additional time to make the required patent disclosures under
15 Patent Local Rules 3-1, 3-2, 3-3, and 3-4 pending settlement negotiations (Dkt. Nos. 38, 39, 41,
16 43, & 45);

17 WHEREAS the requested time modification would require more time for the parties to
18 complete the Early Neutral Evaluation, currently scheduled to be completed by April 17, 2014
19 under the presumptive deadline (Dkt. No. 32);

20 IT IS HEREBY STIPULATED AND AGREED, subject to the approval of this Court,
21 that the date for Cypress’s Disclosure of Asserted Claims and Infringement Contentions and
22 accompanying document production is extended to May 9, 2014 and the date for Silego’s
23 Invalidity Contentions and accompanying document production is extended to June 23, 2014.

24 Dated: April 25, 2014

KAYE SCHOLER, LLP

25
26 By: /s/ Michael J. Malecek

Michael J. Malecek

27 Attorneys for Plaintiff and Counterclaim Defendant
28 CYPRESS SEMICONDUCTOR CORPORATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: April 25, 2014

COVINGTON & BURLING LLP

By: /s/ Robert T. Haslam
Robert T. Haslam
Attorneys for Defendant and Counterclaim Plaintiff
SILEGO TECHNOLOGY, INC.

ECF ATTESTATION

I, Michael J. Malecek, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order to Extend Patent Disclosure Deadlines. In compliance with Civil Local Rule 5-1(i)(3), I attest that counsel for Defendants, Robert T. Haslam, has concurred in this filing.

Dated: April 25, 2014

 /s/ Michael J. Malecek

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: April 28, 2014

 Maxine M. Chesney
HON. MAXINE CHESNEY
UNITED STATES DISTRICT JUDGE