1 2 3 4 5 6 7 8 9	PAUL J. ANDRE (State Bar No. 196585) pandre@kramerlevin.com LISA KOBIALKA (State Bar No. 191404) <u>lkobialka@kramerlevin.com</u> JAMES HANNAH (State Bar No. 237978) <u>jhannah@kramerlevin.com</u> KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 <i>Counsel for Plaintiff</i> FINJAN, INC.	JENNIFER A KASH (Bar No. 203679) jenniferkash@quinnemanuel.com SEAN PAK (Bar No. 219032) seanpak@quinnemanuel.com IMAN LORDGOOEI (Bar No. 251320) imanlordgooei@quinnemanuel.com SAM STAKE (Bar No. 257916) samstake@quinnemanuel.com QUINN EMANUEL URQUHART & SULLIVAN, LLP 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Counsel for Defendants PROOFPOINT, INC, and ARMORIZE
10		PROOFPOINT, INC. and ARMORIZE TECHNOLOGIES, INC.
11	IN THE UNITED STA	TES DISTRICT COURT
12		
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA	
14		ISCO DIVISION
15	FINJAN, INC.,	Case No.: 13-CV-05808-HSG
16	Plaintiff,	STIPULATION AND ORDER EXTENDING TIME FOR EXPERT
17	v.	DISCOVERY
18	PROOFPOINT, INC. and ARMORIZE TECHNOLOGIES, INC.,	Trial Date: March 7, 2016
19	Defendants.	
20		
21 22		
22		
23		
25		
26		
27		
28		
-	STIPULATION AND [PROPOSED] ORDER EX TIME FOR EXPERT DISCOVERY	Case No.: 13-CV-05808-HSG Dockets.Jus

1	Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff Finjan, Inc. and Defendants		
2	Proofpoint, Inc. and Armorize Technologies, Inc. (collectively, "the Parties"), by and through their		
3	respective counsel, have met and conferred in an effort to agree upon a modified schedule for expert		
4	discovery and have stipulated as follows:		
5	WHEREAS, the opening and rebuttal expert reports in this matter were scheduled to be		
6	exchanged respectively on October 7, 2015 and October 28, 2015;		
7	WHEREAS, the completion of the expert discovery in this matter was scheduled on November		
8	6, 2015;		
9	WHEREAS, the Parties stipulated to extend the dates for the exchange of opening expert		
10	reports, rebuttal expert reports and the completion of expert discovery;		
11	WHEREAS, such extension was necessary to accommodate scheduling issues of the various		
12	experts in this matter such as teaching schedules or (in one case) medical issues;		
13	WHEREAS, the Parties stipulated to extend the deadline for exchanging opening expert reports		
14	to October 14, 2015 and opening expert reports were served on that date;		
15	WHEREAS, the Parties stipulated to extend the deadline for exchanging rebuttal expert reports		
16	to November 4, 2015;		
17	WHEREAS, the Parties have stipulated that expert discovery will be extended to November 13,		
18	2015, and damages expert discovery to November 20, 2015;		
19	NOW THEREFORE, the Parties hereby stipulate to and request (1) an extension of the		
20	deadline to exchange opening expert reports from October 7, 2015 to October 14, 2015, (2) an		
21	extension of the deadline to exchange rebuttal expert reports from October 28, 2014 to November 4,		
22	2015, and (3) an extension of the completion of expert discovery from November 6, 2015 to November		
23	13, 2015 for technical expert discovery and November 20, 2015 for damages expert discovery.		
24	IT IS SO STIPULATED.		
25			
26			
27			
28	1		
	STIPULATION AND [PROPOSED] ORDER EXTENDING Case No.: 13-CV-05808-HSG TIME FOR CERTAIN DISCOVERY Case No.: 13-CV-05808-HSG		

1		Respectfully submitted,
2		By: <u>/s/ James Hannah</u>
3		Paul J. Andre (SBN 196585) Lisa Kobialka (SBN 191404)
3		James Hannah (SBN 237978)
4		KRAMER LEVIN NAFTALIS
5		& FRANKEL LLP 990 Marsh Road
6		Menlo Park, CA 94025
7	,	Telephone: (650) 752-1700
/		Facsimile: (650) 752-1800 pandre@kramerlevin.com
8		lkobialka@kramerlevin.com
9		jhannah@kramerlevin.com
10		Counsel for Plaintiff
11		FINJAN, INC.
12		Respectfully submitted,
13	Dated: October 30, 2015	By: /s/ Jennifer Kash
		Jennifer A Kash (Bar No. 203679) Sean Pak (Bar No. 219032)
14		Iman Lordgooei (Bar No. 251320)
15		Sam Stake (Bar No. 257916) QUINN EMANUEL URQUHART &
16		SULLIVAN, LLP 50 California Street, 22nd Floor
17	,	San Francisco, California 94111-4788
18		Telephone: (415) 875-6600 Facsimile: (415) 875-6700
19		jenniferkash@quinnemanuel.com seanpak@quinnemanuel.com
		imanlordgooei@quinnemanuel.com
20	·	<u>samstake@quinnemanuel.com</u> Counsel for Defendants
21		PROOFPOINT, INC. and ARMORIZE
22		TECHNOLOGIES, INC.
23		
24		
25		
26		
27	,	
28		2
	STIPULATION AND [PROPOSED] ORDER TIME FOR CERTAIN DISCOVERY	R EXTENDING Case No.: 13-CV-05808-HSG

1	ATTESTATION PURSUANT TO L.R. 5-1(I)	
1 2	In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this	
2	document has been obtained from any other signatory to this document.	
4	/s/ James Hannah	
5	James Hannah	
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18 19		
20		
21		
22		
23		
24		
25		
26		
27		
28	3	
	STIPULATION AND [PROPOSED] ORDER EXTENDINGCase No.: 13-CV-05808-HSGTIME FOR CERTAIN DISCOVERYCase No.: 13-CV-05808-HSG	

1	ORDER
2	PURSUANT TO STIPULATION, IT IS SO ORDERED.
3	(1) The deadline for opening expert reports is extended from October 7, 2015, to October 14,
4	2015;
5	(2) The deadline for rebuttal expert reports is extended from October 28, 2014 to November 4,
6	2015; and
7	(3) The close of expert discovery is extended from November 6, 2015, to November 13, 2015
8	for technical expert discovery and to November 20, 2015 for damages expert discovery.
9	
10	DATED: November 2, 2015 Haywood S. July.
11	The Honorable Haywood S. Gilliam, Jr. United States District Judge
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23 24	
24	
25	
20	
28	4
	STIPULATION AND [PROPOSED] ORDER EXTENDING Case No.: 13-CV-05808-HSG TIME FOR CERTAIN DISCOVERY