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

17 KARL STORZ ENDOSCOPY-)
 18 AMERICA, INC.,)
)
 19 Plaintiff,)
)
 20 v.)
)
 21 STRYKER CORPORATION and)
 22 STRYKER COMMUNICATIONS, INC.,)
)
 23 Defendants.)

Case No. CV 14-00876 RS

24
 25 **STIPULATION AND ~~PROPOSED~~**
ORDER FOR EXTENSION OF TIME TO
FILE JOINT CLAIM CONSTRUCTION
STATEMENT AND TO COMPLY WITH
PATENT L.R. 4-3
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1 Pursuant to Civil Local Rules 6-1(b) and 7-12, Plaintiff Karl Storz Endoscopy-America, Inc.
2 (“KSEA”) and Defendants Stryker Corporation and Stryker Communications, Inc. (collectively,
3 “Stryker”), by and through their respective undersigned counsel, hereby stipulate to and jointly
4 request an extension of time until January 12, 2015, to file their Joint Claim Construction Statement
5 and to comply with Patent L.R. 4-3. The accompanying declaration of Merle S. Elliott sets forth all
6 requirements of Civil Local Rule 6-2, including identifying all previous time modifications in the
7 case. For the Court’s convenience, the Parties will not repeat all information contained in Ms.
8 Elliott’s declaration, but the Parties do note as follows:

9 1. The deadline for the Parties to file their Joint Claim Construction Statement and to
10 comply with Patent L.R. 4-3 is currently set for Tuesday, January 6, 2015. (*See* Dkt. No. 59.) Given
11 the upcoming winter holidays, and to allow the Parties a full and fair opportunity to review each
12 other’s proposed claim constructions, meet and confer as necessary, and prepare the required
13 documentation for the Court, the Parties jointly request a six (6) day extension of time, until January
14 12, 2015, to file the Joint Claim Construction Statement and to comply with Patent L.R. 4-3.

15 2. This stipulated extension will not alter any other deadlines currently set by the Court.

16 3. Pursuant to Civil Local Rule 6-2(a), this stipulation is accompanied by the Declaration
17 of Merle S. Elliott setting forth (1) the reasons for the requested enlargement of time; (2) all previous
18 time modifications in this case; and (3) the effect of the requested enlargement of time.

19
20 Respectfully submitted,

21 Dated: December 22, 2014

22 REED SMITH LLP

23 /s/ William R. Overend¹
24 William R. Overend (SBN 180209)
25 Attorneys for Defendants,
26 STRYKER CORPORATION and
27 STRYKER COMMUNICATIONS, INC.

28 ¹ In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.

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Dated: December 22, 2014

BECK, BISMONTE & FINLEY, LLP

/s/ Kimberly P. Zapata
Kimberly P. Zapata
Attorneys for Plaintiff,
KARL-STORZ ENDOSCOPY AMERICA, INC.


~~[PROPOSED]~~ ORDER

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

- The Parties have until January 12, 2015, to file their Joint Claim Construction Statement and to comply with Patent L.R. 4-3.

Dated: 12/22, 2014



Honorable Richard G. Seeboig
United States District Judge