20 Plaintiff,) 21 v.) STIPULATION AND [PROPOSED] v.) ORDER ALTERING DEADLINE) RELATED TO PATENT L.R. 4-4	1 2 3 4 5	Alfredo A. Bismonte (Cal. Bar. No. 136154 Kimberly P. Zapata (Cal. Bar. No. 138291) Jeremy M. Duggan (Cal. Bar No. 229854) Beck, Bismonte & Finley, LLP 150 Almaden Blvd, 10 th Floor San Jose, CA 95113 Tel: (408) 938-7900 Fax: (408) 938-0790 Email: abismonte@beckllp.com kzapata@beckllp.com jduggan@beckllp.com)
 Bonjamin C. White (pro hac vice) Benjamin C. White (pro hac vice) ST. ONGE STEWARD JOHNSTON & REENS LLC 986 Bedford Street Stamford, Connecticut 06905 Tel: (203) 324-6155 Fax: (203) 324-6155 Fax: (203) 324-6156 Email: wwhitmye@ssjr.com behberger@ssjr.com behberger@ssjr.com behite@ssjr.com attorneys for Plaintiff, Karl Storz Endoscopy-America, Inc. 14 15 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 18 KARL STORZ ENDOSCOPY- AMERICA, INC., Plaintiff, ORDER ALTERING DEADLINE Plaintiff, STIPULATION AND [PROPOSED] V. ORDER ALTERING DEADLINE RELATED TO PATENT L.R. 44 STRYKER CORPORATION and Defendants. Defendants. 			
8 ST. ONGE STEWARD JOHNSTON & REENS LLC 986 Bedford Street 986 Bedford Street 9 Stamford, Connecticut 06905 11 Fax: (203) 324-6155 12 Email: wwhitnyer@ssjr.com 13 Attorneys for Plaintiff, Karl Storz 14 Endoscopy-America, Inc. 15 UNITED STATES DISTRICT COURT 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA 18 KARL STORZ ENDOSCOPY- 19 AMERICA, INC., 20 Plaintiff, 21 v. 22 Plaintiff, 23 STRYKER CORPORATION and 24 Defendants. 25 Defendants.			
 Stamford, Connecticut 06905 Tel: (203) 324-6155 Fax: (203) 327-1096 Email: wwhitmyer@ssjr.com bwhite@ssjr.com litigation@ssjr.com Attorneys for Plaintiff, Karl Storz Endoscopy-America, Inc. UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION KARL STORZ ENDOSCOPY- AMERICA, INC., Plaintiff, Plaintiff, STIPULATION AND [PROPOSED] v. ORDER ALTERING DEADLINE NORDER ALTERING DEADLINE STRYKER CORPORATION and STRYKER COMMUNICATIONS, INC., Defendants. 			ENS LLC
 Famil: withinyer@ssjr.com blehberger@sjr.com blehberger@sjr.com litigation@ssjr.com Attorneys for Plaintiff, Karl Storz Endoscopy-America, Inc. UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION KARL STORZ ENDOSCOPY- AMERICA, INC., Plaintiff, Plaintiff, STIPULATION AND [PROPOSED] V. ORDER ALTERING DEADLINE STRYKER CORPORATION and STRYKER COMMUNICATIONS, INC., Defendants. 		· · · · · · · · · · · · · · · · · · ·	
 bowhite@ssjr.com Attorneys for Plaintiff, Karl Storz Endoscopy-America, Inc. UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION KARL STORZ ENDOSCOPY- AMERICA, INC., Plaintiff, Plaintiff, STIPULATION AND [PROPOSED] V. ORDER ALTERING DEADLINE RELATED TO PATENT L.R. 4-4 STRYKER COMPORATION and STRYKER COMMUNICATIONS, INC., Defendants. Defendants. 			
Attorneys for Plaintiff, Karl Storz IA IA Attorneys for Plaintiff, Karl Storz Endoscopy-America, Inc. IS UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION IA IA<			
14 Endoscopy-America, Inc. 15 UNITED STATES DISTRICT COURT 16 NORTHERN DISTRICT OF CALIFORNIA 17 SAN FRANCISCO DIVISION 18 KARL STORZ ENDOSCOPY- 19 AMERICA, INC., 20 Plaintiff, 21 v. 22 STRYKER CORPORATION and 23 STRYKER COMMUNICATIONS, INC., 24 Defendants. 25 Defendants.	12		
14	13		
16 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 17 SAN FRANCISCO DIVISION 18 KARL STORZ ENDOSCOPY-) 19 AMERICA, INC.,) 20 Plaintiff,) 21 v.) 22 STRYKER CORPORATION and) 23 STRYKER COMMUNICATIONS, INC.,) 24 Defendants.) 25 26	14		
16 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 17	15	UNITED STA	TES DISTRICT COURT
AMERICA, INC., Plaintiff, V. STRYKER CORPORATION and STRYKER COMMUNICATIONS, INC., Defendants. Case No. CV 14-00876 RS STIPULATION AND [PROPOSED] ORDER ALTERING DEADLINE RELATED TO PATENT L.R. 4-4		NORTHERN DIS	STRICT OF CALIFORNIA
19 AMERICA, INC.,) Case No. CV 14-00876 RS 20 Plaintiff,)) 21 v.) STIPULATION AND [PROPOSED] 22 STRYKER CORPORATION and) STRYKER COMMUNICATIONS, INC., 23 Defendants.)	18	KARL STORZ ENDOSCOPY-)
21 v.) STIPULATION AND [PROPOSED] 22 v.) ORDER ALTERING DEADLINE 22 STRYKER CORPORATION and)) 23 STRYKER COMMUNICATIONS, INC.,) 24 Defendants.) 25 26 27	19		Case No. CV 14-00876 RS
21 v.) ORDER ALTERING DEADLINE 22 STRYKER CORPORATION and)) 23 STRYKER COMMUNICATIONS, INC.,) 24 Defendants.) 25 26	20	Plaintiff,)
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Pursuant to Civil Local Rules 6-1(b) and 7-12, Plaintiff Karl Storz Endoscopy-America, Inc. ("KSEA") and Defendants Stryker Corporation and Stryker Communications, Inc. (collectively, "Stryker"), by and through their respective undersigned counsel, hereby stipulate to and jointly request that the deadline for taking discovery relating to claim construction and complying with Patent L.R. 4-4 be extended to March 31, 2015. The accompanying declaration of Michael A. Lavine sets forth all requirements of Civil Local Rule 6-2, including identifying all previous time modifications in the case. For the Court's convenience, the Parties will not repeat all information contained in Mr. Lavine's declaration, but the Parties do note as follows:

1. Under the current schedule, the deadline for the Parties to complete discovery relating to claim construction pursuant to Patent L.R. 4-4 is February 27, 2015. (Doc. 110.) Now that the deadline for the parties to file responsive claim construction briefs has been continued to April 8, 2015 (Doc. 124), the Parties jointly request that the schedule be modified to provide the Parties with additional time to complete discovery relating to claim construction, which will include several expert depositions. This will make the claim construction discovery period more efficient, allow the Parties more flexibility to accommodate the schedules of their expert witnesses, and potentially avoid the expense of taking the depositions in the event that the Court grants Stryker's Motion to Stay. Accordingly, the Parties jointly request that the deadline for claim construction discovery be moved to March 31, 2015. Thus, the Parties' request would extend the deadline for claim construction discovery by four weeks and four days.

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

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

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2		Respectfully submitted,
3	Dated: February 25, 2015	REED SMITH LLP
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5		/s/ William R. Overend
6		William R. Overend (SBN 180209) Attorneys for Defendants, STRYKER CORPORATION and
7		STRYKER CORPORATION and STRYKER COMMUNICATIONS, INC.
8		
9	Dated: February 25, 2015	BECK, BISMONTE & FINLEY, LLP
10	Duca. 1 cordary 20, 2010	
11		<u>/s/ Alfredo A. Bismonte1</u> Alfredo A. Bismonte
12		Attorneys for Plaintiff,
13		KARL-STORZ ENDOSCOPY AMERICA, INC.
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28	¹ In compliance with Civil Local Rule	5-1(i), I hereby attest that concurrence in the filing of this

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.

1	[PROPOSED] ORDER
2	PURSUANT TO STIPULATION, IT IS SO ORDERED:
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4	• The Parties have until March 31, 2015 to take discovery relating to claim construction
5	and to comply with Patent L.R. 4-4.
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7	$\Delta 1101$
8	Dated: February 26 , 2015
9	Honorable Richard G. Seeborg United States District Judge
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