BLANK ROME LLP 1 Naki Margolis, Esq. (SBN 94120) 2 601 Montgomery Street, Suite 2030 San Francisco, CA 94111 3 Phone: 415-986-2144 4 Victor M. Wigman, Esq. Charles R. Wolfe, Jr. Esq. 5 Brian Wm. Higgins, Esq. Nicholas M. Nyemah, Esq. (SBN 274550) 600 New Hampshire Avenue, N.W. 6 Washington, DC 20037 7 Phone: 202-772-5800 8 David A. Dorey, Esq. 1201 Market Street, Suite 800 9 Wilmington, DE 19801 Phone: 302-425-6400 10 Attorneys for PLAINTIFF, SEGAN LLC 11 12 **DURIE TANGRI LLP** Sonali D. Maitra, Esq. (SBN 254896) 13 Sarah E. Stahnke, Esq. (SBN 264838) 217 Leidesdorff Street 14 San Francisco, CA 94111 Phone: 415-362-6666 15 16 Attorneys for DEFENDANT ZYNGA, INC. 17 IN THE UNITED STATES DISTRICT COURT 18 FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION 19 20 Case No. 3:14-cv-01315-VC SEGAN LLC, 21 Plaintiff, 22 JOINT STIPULATION FOR CLAIM V. CONSTRUCTION AND SUMMARY 23 ZYNGA INC. JUDGMENT BRIEFING SCHEDULE Defendant. 24 Ctrm: 4, 17th Floor 25 26 Judge: Hon. Vince Chhabria 27 28 JOINT STIPULATION FOR CLAIM CONSTRUCTION AND SUMMARY JUDGMENT **BRIEFING SCHEDULE**

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Pursuant to this Court's Scheduling Order (ECF No. 72), including paragraph 6 of that Order affording parties equal opportunities to depose expert declarants, and pursuant to paragraph 29 of this Court's December 19, 2014 Standing Order, the parties provide the following stipulation:

- 1. Zynga will file its opening summary judgment and claim construction brief, not exceeding 40 pages, by January 23, 2015.
- 2. Segan will file its opposition/answering brief, not exceeding 40 pages, by 9:00am PT on February 20, 2015.
- 3. Segan will make any expert providing a declaration in its opposition/answering brief available for deposition no later than February 27, 2015.
- 4. Zynga will file its reply brief, not exceeding 20 pages, by March 11, 2015.
- 5. In the event that Zynga submits an expert declaration in support of its reply brief, Zynga will make its expert available for deposition no later than March 18, 2015. Segan may file a subsequent brief by March 25, 2015 of no more than 5 pages (in addition to any transcript excerpts for the record), limited to addressing the deposition of Zynga's expert and its impact on the parties' arguments.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

DATED: January 7, 2014

/s/ David A. Dorey

David A. Dorey

Attorney for Plaintiff Segan LLC

DATED: January 7, 2014

/s/ Sonali D. Maitra

Sonali D. Maitra

Attorney for Defendant Zynga, Inc.