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19 **UNITED STATES DISTRICT COURT**  
 20 **NORTHERN DISTRICT OF CALIFORNIA**  
 21 **SAN FRANCISCO DIVISION**

22	ROBERT BOSCH HEALTHCARE	)	CASE NO. 3:14-cv-01575-EMC
	SYSTEMS, INC.,	)	
23		)	JOINT STIPULATION TO EXTEND
	Plaintiff,	)	TIME TO REPLY REGARDING
24		)	MOTION TO LIFT STAY AND
	v.	)	CONTINUE HEARING DATE FOR
25		)	MOTION AND CASE MANAGEMENT
	CARDIOCOM LLC,	)	CONFERENCE
26		)	
	Defendant.	)	

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28 JOINT STIPULATION TO EXTEND TIME TO REPLY  
 REGARDING MOTION TO LIFT STAY AND CONTINUE  
 HEARING DATE FOR MOTION AND CASE MANAGEMENT  
 CONFERENCE

CASE No. 3:14-cv-01575-EMC

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Robert Bosch Healthcare Systems, Inc.  
2 (“Bosch”) and Defendant Cardiocom, LLC (“Cardiocom”) hereby submit this Joint Stipulation to  
3 Extend Time to Reply Regarding Motion to Lift Stay and Continue Hearing Date for Motion and  
4 Case Management Conference. The parties stipulate that Bosch’s reply brief regarding its Motion to  
5 Lift Stay (Dkt. 171) may be extended from January 26, 2017 to February 2, 2017. Bosch requests  
6 the extension so it can work with Bosch’s representatives in Germany to respond to Cardiocom’s  
7 opposition.

8 The hearings for Bosch’s Motion to Lift Stay and the Case Management Conference are  
9 currently scheduled for February 23, 2017 at 1:30. (Dkts. 171 and 173.) The parties stipulate and  
10 request that the Court continue the Case Management Conference to March 2, 2017 in order to  
11 accommodate a conflict of Cardiocom’s lead Counsel, Daniel McDonald of the Merchant & Gould  
12 firm related to a hearing scheduled in Minnesota.

13 The requested continuance shall not otherwise affect scheduling issues for the case. No  
14 previous extension of Bosch’s reply deadline has been requested or granted. The parties had  
15 previously requested to move the hearing date, but did not foresee the conflict of the new date.

16 IT IS SO STIPULATED, through counsel of record:

17 DATED: January 25, 2017

18 /s/ Bas de Blank  
19 Counsel for Plaintiff Robert Bosch Healthcare  
20 Systems, Inc.

21 DATED: January 25, 2017

22 /s/ Adam Alper  
23 Counsel for Defendant Cardiocom, LLC

24 **PURSUANT TO STIPULATION, IT IS SO ORDERED** that Bosch, Inc. shall have until  
25 February 2, 2017 to file its Reply regarding Bosch’s Motion to Lift Stay (Dkt. 171) and the hearings  
26 for that motion and the Case Management Conference are continued to March 2, 2017.

27 Dated: 1/27/2017



28 \_\_\_\_\_  
DISTRICT JUDGE

1 **DECLARATION OF WILLIAM SCHULTZ**  
2 **IN SUPPORT OF JOINT STIPULATION TO EXTEND TIME TO REPLY REGARDING**  
3 **MOTION TO LIFT STAY AND CONTINUE HEARING DATE FOR MOTION AND CASE**  
4 **MANAGEMENT CONFERENCE**

5 1. I am an attorney for Cardiocom, LLC in this matter. The statements made herein are  
6 based on my personal knowledge and on information made available to me in the course of my  
7 duties and responsibilities for Cardiocom, LLC.

8 2. I corresponded with Bas de Blank, counsel for Bosch, Inc. regarding the hearing date  
9 for Bosch's Motion to Lift Stay and the Case Management Conference, both of which are currently  
10 scheduled for February 23, 2017. I requested that Bosch agree to continue the hearing date one  
11 week to March 2, 2017 based on a conflict relating to a hearing in another case scheduled in  
12 Minnesota. Bosch's counsel agreed to continue the hearing to March 2, 2017.

13 3. Bosch has requested a one week extension of time to file its reply regarding Bosch's  
14 Motion to Lift Stay. Bosch's reply is currently due January 26, 2017. The extension would make  
15 Bosch's brief due February 2, 2017. Cardiocom does not oppose Bosch's request.

16 4. The requested continuance and extension shall not otherwise affect scheduling issues  
17 for the case.

18 5. The parties have not previously requested an extension for Bosch to file its reply  
19 regarding Bosch's Motion to Lift Stay. The parties previously requested to move the hearing date  
20 based on other conflicts. The current request would move the hearings back one week, from  
21 February 23, 2017 to March 2, 2017.  
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1 I declare under penalty of perjury under the laws of the United States of America that the foregoing  
2 is true and correct. Executed on January 25, 2017 at Minneapolis, MN.

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4 /s/ William Schultz  
5 William Schultz  
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1 **ATTESTATION OF CONCURRENCE IN FILING**

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3 I Adam Alper, am the ECF User whose identification and password are being used to file this

4 Joint Stipulation. In compliance with Local Rule 5-1(i)(3), I hereby attest that Bas de Blank of

5 Orrick, Herrington & Sutcliffe LLP has concurred in this filing.

6

7 DATED: January 25, 2017

/s/ Adam Alper

**CERTIFICATE OF SERVICE**

I hereby certify that on January 25, 2017, a copy of the foregoing document is being electronically filed with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system, which will send notice of such filing to all counsel of record.

*/s/Adam Alper* \_\_\_\_\_

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