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11
 12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN FRANCISCO**

16 OPENTV, INC. AND NAGRAVISION, SA,
 17 Plaintiffs,
 18 v.
 19 APPLE INC.,
 20 Defendant.

Case No. 3:14-cv-01622-JST

**JOINT STIPULATION TO EXTEND
 DEADLINE TO FILE ESI
 STIPULATION AND STIPULATED
 PROTECTIVE ORDER**

**Case Filed: April 9, 2014
 Judge: Honorable Jon S. Tigar**

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1 Pursuant to Civil L.R. 6-2 and 7-12, Plaintiffs OpenTV, Inc., and Nagravision, SA
2 (“OpenTV”) and Defendant Apple Inc. (“Apple”) hereby stipulate to extend the deadline to file
3 an ESI Stipulation and Stipulated Protective Order to September 5, 2014.

4 WHEREAS, pursuant to the Court’s July 25, 2014 Scheduling Order (Dkt. 59), the Parties
5 were required to file an ESI Stipulation and a Stipulated Protective Order by September 2, 2014;

6 WHEREAS, the Parties are continuing to negotiate in good faith regarding the terms of
7 the ESI Stipulation and Stipulated Protective Order;

8 WHEREAS, the Parties believe that that they could make further progress towards
9 reaching agreement on the terms of the ESI Stipulation and Stipulated Protective Order with
10 additional time to continue their meet and confer discussions; and

11 WHEREAS, the Parties have not previously requested any modifications to the Court’s
12 Scheduling Order, and the modification requested herein will not affect any other scheduled dates
13 or events in this action;

14 It is hereby STIPULATED AND AGREED, by and between the Parties, subject to the
15 approval of the Court, as follows:

16 The Parties will file an ESI Stipulation and Stipulated Protective Order, including an
17 identification of any outstanding disputes regarding the terms of both, no later than
18 September 5, 2014.

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20 Pursuant to Civil L.R. 6-2(a), this stipulation is supported by the concurrently filed
21 Declaration of Luann L. Simmons.

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IT IS SO STIPULATED.
Dated: September 2, 2014

<p>O'MELVENY & MYERS LLP</p> <hr/> <p>s/ Luann L. Simmons George A. Riley (S.B. #118304) griley@omm.com Luann L. Simmons (S.B. #203526) lsimmons@omm.com Melody Drummond Hansen (S.B. #278786) mdrummondhansen@omm.com O'MELVENY & MYERS LLP Two Embarcadero Center, 28th Floor San Francisco, California 94111-3823 Telephone: (415) 984-8700 Facsimile: (415) 984-8701</p> <p>Ryan K. Yagura (S.B. #197619) ryagura@omm.com Vincent Zhou (S.B. #251969) vzhou@omm.com Kevin Murray (S.B. #275186) kmurray2@omm.com O'MELVENY & MYERS LLP 400 South Hope Street Los Angeles, California 90071-2899 Telephone: (213) 430-6000 Facsimile: (213) 430-6407</p> <p>Attorneys for Defendant APPLE INC.</p>	<p>FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP</p> <hr/> <p>s/ Elizabeth A. Niemeyer Robert F. McCauley (SBN 162056) robert.mccauley@finnegan.com Jacob A. Schroeder (SBN 264717) jacob.schroeder@finnegan.com FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP 3300 Hillview Avenue Palo Alto, CA 94304-1203 Telephone: (650) 849-6600 Facsimile: (650) 849-6666</p> <p>Gerald F. Ivey (pro hac vice) Smith R. Brittingham IV (pro hac vice) Elizabeth A. Niemeyer (pro hac vice) John M. Williamson (pro hac vice) Aliza A. George (pro hac vice) Robert D. Wells (SBN 277903) FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP 901 New York Avenue, NW Washington, DC 20001-4413 Telephone: (202) 408-4000 Facsimile: (202) 408-4400</p> <p>Stephen E. Kabakoff (pro hac vice) FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP 3500 SunTrust Plaza 303 Peachtree Street, N.E. Atlanta, GA 30308-3263 Telephone: (404) 653- 6400 Facsimile: (404) 653-6444</p> <p>Attorneys for Plaintiffs OPENTV, INC. AND NAGRAVISION, SA</p>
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ATTESTATION

Pursuant to General Order No. 45 X(B), I hereby attest that concurrence in the filing of this document has been obtained from Elizabeth A. Niemeyer.

By: /s/ Luann L. Simmons

Luann L. Simmons

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 2, 2014

