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8 Attorneys for Plaintiffs
 REMBRANDT PATENT INNOVATIONS, LLC and
 9 REMBRANDT SECURE COMPUTING, LP

Attorneys for Defendant Apple Inc.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN FRANCISCO DIVISION

14 **REMBRANDT PATENT INNOVATIONS,
 LLC and REMBRANDT SECURE
 15 COMPUTING, LP,**

NO. 3:14-cv-05094-WHA (Lead)
 NO. 3:14-cv-05093-WHA (Consolidated)

16 Plaintiffs,

**JOINT STIPULATION TO AMEND
 CASE MANAGEMENT ORDER AND
 17 ~~[PROPOSED]~~ ORDER**

17 v.

18 **APPLE INC.**

Judge: Honorable William H. Alsup
 Courtroom: 8, 19th Floor

19 Defendants.

1 Pursuant to Civil L.R. 6-2, Plaintiffs Rembrandt Patent Innovations LLC and Rembrandt
2 Secure Computing, LP (collectively “Rembrandt”) and Defendant Apple Inc. (“Apple”) hereby
3 submit this Joint Stipulation to Amend Case Management Order and Proposed Order.

4 On February 4, Rembrandt served on Apple a notice of deposition pursuant to Fed. R. Civ. P.
5 30(b)(6). For topic number 7, Apple designated Mr. Patrick McNamara, an Apple employee, for a
6 deposition scheduled for March 18. On Tuesday, March 15, Apple’s counsel was informed that Mr.
7 McNamara is no longer available on Friday, March 18, due to an unforeseen conflict. Mr.
8 McNamara is next available for deposition on March 29.

9 On February 1, Apple served on Rembrandt a notice of deposition pursuant to Fed. R. Civ. P.
10 30(b)(6). For topics 1, 2, 3, 5, 7, 8 and 9, Rembrandt designated Mr. Daniel Golub, a Rembrandt
11 employee, for a deposition originally scheduled for March 9. On March 2, Rembrandt’s counsel was
12 informed that Mr. Golub was no longer available on March 9. Mr. Golub is next available for
13 deposition on March 25.

14 Because Mr. McNamara’s and Mr. Golub’s depositions would occur so close to the parties’
15 deadline to submit opening expert reports, March 31 (Dkt. No. 64), the parties met and conferred and
16 respectfully request that the Court amend the dates in the case management order to extend the
17 expert-related deadlines by one week. The parties’ proposed amendment to the case management
18 order will not change any dates on the Court’s calendar. The chart below details the parties’
19 proposed amended case schedule.

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21 **Proposed Amended Case Schedule**

Event	Applicable Order	Ordered Deadline	Parties’ Proposed Amended Deadline
Serve Opening Expert Reports	Dkt. No. 64	March 31, 2016	April 7, 2016
Serve Opposition Reports	Dkt. No. 64	April 14, 2016	April 21, 2016
Serve Reply Reports	Dkt. No. 64	April 21, 2016	April 28, 2016
Close of Expert Discovery	Dkt. No. 64	May 5, 2016	May 12, 2016

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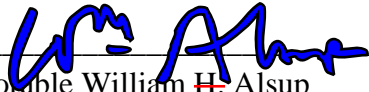
Event	Applicable Order	Ordered Deadline	Parties' Proposed Amended Deadline
Last Day to File Dispositive Motions	Dkt. No. 64	May 5, 2016	No change
Final Pretrial Conference	Dkt. No. 64	June 29, 2016, at 2:00 p.m.	No change
Jury Trial	Dkt. No. 64	July 11, 2016, at 7:30 a.m.	No change

~~PROPOSED~~ ORDER

The above JOINT STIPULATION TO AMEND CASE MANAGEMENT ORDER AND
[PROPOSED] ORDER is hereby GRANTED and the amended schedule proposed by the parties is
hereby adopted.

IT IS SO ORDERED.

Dated: March 21, 2016.


Honorable William H. Alsup
United States District Judge

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