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 13 **UNITED STATES DISTRICT COURT**
 14 **NORTHERN DISTRICT OF CALIFORNIA**
 15 **SAN FRANCISCO DIVISION**

16
 17 AMERICAN NAVIGATION SYSTEMS,
 18 INC.,

19 Plaintiff,

20 v.

21 SAMSUNG ELECTRONICS CO., LTD.,
 22 SAMSUNG ELECTRONICS AMERICA,
 23 INC., and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 24 LLC,

25 Defendants.

Case No. 3:14-cv-05298-JST

**STIPULATION AND ~~PROPOSED~~
 ORDER SUPPLEMENTING THE
 JOINT CASE MANAGEMENT
 STATEMENT**

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 28 SUPPLEMENTAL JOINT CASE
 MANAGEMENT STATEMENT AND
~~PROPOSED~~ ORDER
 NO. 3:14-CV-05298-JST

1 Pursuant to the Court’s Order (D.I. 101), Plaintiff American Navigation Systems, Inc.
2 (“AmNav”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics
3 America, Inc. (collectively “Samsung”)¹ hereby submit this stipulation and proposed order
4 supplementing the parties’ Joint Case Management Statement (D.I. 91).

5 WHEREAS AmNav alleges that both Samsung and Apple Inc. (“Apple”) infringe the
6 same patent, U.S. Patent No. 5,902,347 (the “’347 Patent”), in two cases captioned *American*
7 *Navigation Systems, Inc. v. Apple, Inc.*, 3:14-cv-05297-JST (“Apple-AmNav case”) and
8 *American Navigation Systems, Inc. v. Samsung Electronics Co., Ltd., et. al.*, 3:14-cv-05298-
9 JST (“Samsung-AmNav case”); and

10 WHEREAS the Court has ordered the parties to file a statement by March 18, 2015,
11 informing the Court if they agree to have ten common terms construed in total for both the
12 AmNav-Samsung and AmNav-Apple cases (in compliance with the ten-term limit in the local
13 patent rules) or to set a telephonic case management conference for March 25, 2015 at 4:00
14 p.m. if the parties could not file the statement (D.I. 101).

15 IT IS HEREBY STIPULATED AND AGREED that, pursuant to the Court’s order
16 (D.I. 101), the parties will construe a total of ten common claim terms (or less) of the ’347
17 Patent across both the AmNav-Samsung and AmNav-Apple cases, that the parties will have a
18 single claim construction hearing for both cases, and that the March 25, 2015 telephonic case
19 management conference is vacated.²

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25 ¹ According to its Supplemental Corporate Disclosure Statement (D.I. 69), Samsung
26 Telecommunications America LLC merged into Defendant Samsung Electronics America,
27 Inc. as of January 1, 2015, and no longer exists as a separate entity.

28 ² Apple and AmNav are filing a substantively identical stipulation and proposed order in their
case.

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Dated: March 16, 2015

Dated: March 16, 2015

By: /s/ Barry Barnett

By: /s/ David Almeling

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ATTORNEY ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from each of its signatories.

Dated: March 16, 2015

By: /s/ David Almeling
David Almeling

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CASE MANAGEMENT ORDER

The above STIPULATION AND PROPOSED ORDER SUPPLEMENTING THE JOINT CASE MANAGEMENT STATEMENT is Approved and all parties shall comply with its Provisions.

IT IS SO ORDERED.

Dated: March 17, 2015

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