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17 Attorneys for Plaintiff/ Counterclaim-  
18 Defendants: *WHTECRYPTION CORPORATION AND*  
19 *INTERTRUST TECHNOLOGIES, CORPORATION*

20 [ADDITIONAL COUNSEL LISTED IN SIGNATURE  
21 BLOCK]

22 **UNITED STATES DISTRICT COURT**  
23 **NORTHERN DISTRICT OF CALIFORNIA**  
24 **SAN FRANCISCO DIVISION**

25 WHITECRYPTION CORPORATION,

26 Plaintiff,

27 v.

28 ARXAN TECHNOLOGIES, INC.,

Defendant.

Case No. 3:15-CV-00754-WHO

**STIPULATION AND ORDER TO  
CONTINUE CASE DEADLINES**

Date: N/A

Time: N/A

Courtroom: 02, 17<sup>th</sup> Floor

Judge: Hon. William H. Orrick  
450 Golden Gate Avenue  
San Francisco, CA

ARXAN TECHNOLOGIES, INC.,

Counter-Claimant,

v.

WHITECRYPTION CORPORATION; and  
INTERTRUST TECHNOLOGIES  
CORPORATION

Counter-Defendants.

1 Plaintiff and cross-defendants whiteCryption Corporation (“whiteCryption”) and Intertrust  
2 Technologies Corporation (“Intertrust”) and defendant and counterclaimant Arxan Technologies,  
3 Inc. (“Arxan”) stipulate and agree as follows:

4 1. On February 18, 2015, whiteCryption initiated the above-captioned action against  
5 Arxan.

6 2. Arxan answered and counterclaimed against whiteCryption and Intertrust on April  
7 10, 2015.

8 3. Between May and June 2015, the parties engaged in motion practice regarding the  
9 counterclaims, and on June 18, 2015, the Court granted Intertrust’s motion to dismiss with leave to  
10 amend.

11 4. On June 17, 2015, the Court issued a Civil Pretrial Order setting the deadlines in  
12 this action. ECF No. 35. The Court later ordered the parties to a settlement conference with a  
13 magistrate judge and modified the case schedule to accommodate a first phase of document  
14 discovery prior to the settlement conference. *See* ECF. Nos. 42-45.

15 5. On January 5, 2016, the parties’ participated in a settlement conference with a  
16 magistrate judge, which did not result in settlement. ECF No. 46.

17 6. On February 17, 2016, whiteCryption filed its first amended complaint and Arxan  
18 filed its first amended counterclaims. ECF Nos. 51-52.

19 7. On March 22, 2016, whiteCryption and Intertrust moved to dismiss the first  
20 amended counterclaims (ECF No. 66), and on June 15, 2016 the Court granted in part and denied  
21 in part the motion without leave to amend (ECF No. 89).

22 8. The parties have engaged in extensive discovery, collectively producing hundreds  
23 of thousands of documents and approximately 20 depositions will be taken, two of which are  
24 scheduled to take place after the close of fact discovery.<sup>1</sup> Based on the document productions and  
25 scheduling issues, the first deposition did not occur until June 16, 2016.

26 <sup>1</sup> whiteCryption will take the deposition of Google at a mutually agreeable date after Google  
27 produces the documents the Court ordered it to produce. *See* Dkt. No. 101. whiteCryption will  
28 take the deposition of a former Arxan employee on July 21, 2016 by agreement of the parties. The  
deposition was planned for July 8, but the deponent has a family emergency, which necessitated a  
rescheduling with no available alternative before the July 15, 2016 fact discovery deadline.



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*ARXAN TECHNOLOGIES, INC.*

Respectfully submitted,

Dated: July 5, 2016

By: /s/ Rajiv Dharnidharka

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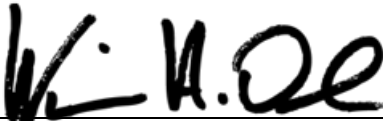
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**PURSUANT TO STIPULATION, IT IS SO ORDERED except as modified below:**

**Pre-trial conference: February 27, 2017 at 2:00 p.m.**

**Trial: April 3, 2017 at 8:30 a.m.**

Dated: July 6, 2016

  
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HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT COURT JUDGE