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11 Attorneys for Plaintiff/ Counterclaim-  
 Defendants: *WHITIECRYPTION CORPORATION AND*  
 12 *INTERTRUST TECHNOLOGIES, CORPORATION*

13 [ADDITIONAL COUNSEL LISTED IN SIGNATURE  
 BLOCK]

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

17 WHITECRYPTION CORPORATION,  
 18 Plaintiff,  
 19 v.  
 20 ARXAN TECHNOLOGIES, INC.,  
 21 Defendant.

22 ARXAN TECHNOLOGIES, INC.,  
 23 Counter-Claimant,  
 24 v.  
 25 WHITECRYPTION CORPORATION; and  
 26 INTERTRUST TECHNOLOGIES  
 CORPORATION  
 27 Counter-Defendants.

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

**STIPULATION AND  
 ORDER TO CONTINUE CASE  
 DEADLINES**

Date: N/A  
 Time: N/A  
 Courtroom: 02  
 Judge: Hon. William H. Orrick  
 450 Golden Gate Avenue  
 San Francisco, CA

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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.

13 5. From June through December 2015, the parties have cooperated on a phased  
14 discovery effort to facilitate settlement discussions. The parties, for example, have exchanged  
15 several document productions, retained software code comparison experts, and completed code  
16 comparisons in an effort to identify and narrow issues for settlement discussions. Document  
17 discovery, however, is not complete, nor have the parties yet taken any depositions, in favor of the  
18 targeted approach described above in the lead up to a settlement discussion.

19 6. On November 2, 2015, the Court granted the parties’ request for a settlement  
20 conference with a magistrate judge and ordered that the parties appear for a conference on January  
21 5, 2016.

22 7. In light of the settlement conference and likely continued settlement discussions  
23 after the conference if the parties are unable to reach complete resolution on January 5, 2016, the  
24 parties agree that continuing all case deadlines by approximately ninety (90) days would assist in  
25 the parties settlement efforts, as well as conserve the parties’ and the Court’s resources.

26 8. Neither party has previously requested an extension or modification of any  
27 deadlines in the Civil Pretrial Order.

28

1 Therefore, the parties stipulate and agree, subject to the court's approval, that all case  
2 deadlines be extended by approximately ninety (90) days as follows:

	<b>Current Deadline</b>	<b>Proposed Deadline</b>	
3			
4	Deadline to amend/add parties	December 31, 2015	March 31, 2016
5	Fact discovery cutoff	April 15, 2016	July 15, 2016
6	Expert disclosure	April 29, 2016	July 29, 2016
7	Expert rebuttal	May 20, 2016	August 22, 2016
8	Expert discovery cutoff	June 10, 2016	September 12, 2016
9	Dispositive Motions heard by	August 10, 2016	November 9, 2016
10	Pretrial Conference	October 7, 2016	January 23, 2017 (or as the 11 Court's calendar allows)
12	Trial (jury)	November 14, 2016	February 27, 2017 (or as the 13 Court's calendar allows)

14 Respectfully submitted,

15  
16 Dated: December 18, 2015

16 By: /s/Michael T. Jones  
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