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 GOOGLE INC.
 17
 18 (additional counsel listed on signature page)

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**

22 WORD TO INFO, INC.,
 23
 Plaintiff,
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 v.
 25
 GOOGLE INC.
 26
 Defendant.
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Case No. 3:15-cv-03486-WHO

**STIPULATED REQUEST TO MODIFY
 HEARING DATE AND BRIEFING
 SCHEDULE FOR WORD TO INFO,
 INC.'S MOTION FOR LEAVE TO
 AMEND INFRINGEMENT
 CONTENTIONS**

1 TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR COUNSEL OF
2 RECORD HEREIN:

3 WHEREAS Plaintiff Word to Info, Inc. (“Plaintiff”) filed its Motion for Leave to Amend
4 Infringement Contentions (Dkt. 116) on Thursday, March 31, 2016, and noticed a hearing date
5 for May 11, 2016;

6 WHEREAS under this schedule, Defendant Google Inc.’s (“Google”) opposition to
7 Plaintiff’s motion would be due by Thursday, April 14, 2016, and Plaintiff’s reply would be due
8 Thursday, April 21, 2016;

9 WHEREAS Google has informed Plaintiff that Google intends to submit a cross-motion
10 to strike Plaintiff’s infringement contentions;

11 WHEREAS Google and Plaintiff agree that hearing these motions at the same time would
12 be more efficient for both the Court and the parties and that a modified hearing date of May 25,
13 2016, would permit these motions to be heard at the same time;

14 WHEREAS Google and Plaintiff now request that the hearing date for Plaintiff’s motion
15 be moved to May 25, 2016;

16 WHEREAS Google and Plaintiff agree that there is good cause for modifying the
17 briefing schedule for Plaintiff’s Motion for Leave to Amend Infringement Contentions (Dkt.
18 116) to facilitate briefing and hearing that motion and Google’s cross-motion at the same time;

19 WHEREAS Plaintiff and Google now request that Google’s opposition to Plaintiff’s
20 motion be filed by Tuesday, April 19, 2016, and Plaintiff’s reply be filed by Wednesday May 4,
21 2016;

22 WHEREAS the parties’ stipulation does not change any other dates in the current
23 schedule and does not accelerate or extend any other time frames set in the Local Rules or in the
24 Federal Rules;

25 IT IS STIPULATED AND REQUESTED that, subject to the Court’s approval, the
26 hearing date for Plaintiff’s Motion for Leave to Amend Infringement Contentions be May 25,
27 2016; that Google’s opposition to Plaintiff’s motion be due April 19, 2016; and that Plaintiff’s
28 reply be due May 4, 2016.

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Dated: April 12, 2016

Respectfully submitted,

By: /s/ Steve Daniels
Steven R. Daniels

By: /s/ Nicholas Groombridge
Nicholas Groombridge

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Attorneys for Defendant
Google Inc.

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2 **CIVIL L.R. 6-2 DECLARATION**

3 In accordance with Civil Local Rule 6-2, I declare that good cause supports the parties'
4 stipulated request for modifying the hearing date for Plaintiff Word to Info, Inc.'s Motion for
5 Leave to Amend Infringement Contentions to May 25, 2016; the due date for Google Inc.'s
6 opposition to that motion to April 19, 2016; and the due date for Word to Info, Inc.'s reply to
7 May 4, 2016. The requested modifications will permit Google Inc.'s forthcoming cross-motion
8 to strike Plaintiff's infringement contentions to be heard at the same time.

9 The parties previously stipulated to an extension of time to the date of February 12, 2016,
10 for Facebook, Inc. to serve its Invalidity Contentions; the date of February 19, 2016, for Google
11 Inc. to serve its Invalidity Contentions; the date of February 26, 2016, for the Exchange of
12 Proposed Terms for Claim Construction; and the date of March 4, 2016, for the Exchange of
13 Preliminary Constructions because Plaintiff and Defendant Google Inc. were meeting and
14 conferring regarding Plaintiff's Infringement Contentions. The Court entered its order granting
15 this stipulation on February 26, 2016.

16 The parties subsequently agreed to the date of March 18, 2016, for the Exchange of
17 Preliminary Constructions and the date of April 1, 2016, for the submission of the parties' Joint
18 Claim Construction and Prehearing Statement pursuant to Patent L.R. 4-3. The Court entered its
19 order granting this stipulation on March 29, 2016.

20 The parties then agreed to the date of April 8, 2016, for the submission of the parties'
21 Joint Claim Construction and Prehearing Statement pursuant to Patent L.R. 4-3. The Court
22 entered its order granting this stipulation on April 4, 2016.

23 The current stipulated request to modify the hearing date for Plaintiff's motion as well as
24 associated briefing dates does not change any other dates in the current schedule, including the
25 scheduled claim construction hearing on June 17, 2016, and does not accelerate or extend any
26 other time frames set in the Local Rules or in the Federal Rules.

27 DATED: April 12, 2016

/s/ James Razick
James Razick

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), David Ball, hereby attests that the above-named signatories concur in this filing.

DATED: April 12, 2016

/s/David Ball

April 12, 2016

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