

1 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
 Nicholas Groombridge (admitted *pro hac vice*)  
 2 ngroombridge@paulweiss.com  
 Jenny C. Wu (admitted *pro hac vice*)  
 3 jcwu@paulweiss.com  
 1285 Avenue of the Americas  
 4 New York, NY 10019-6064  
 Telephone: (212) 373-3000  
 5 Facsimile: (212) 757-3990

6 PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP  
 David J. Ball Jr. (admitted *pro hac vice*)  
 7 dball@paulweiss.com  
 David K. Stark (SBN 279089)  
 8 dstark@paulweiss.com  
 2001 K Street, NW, Suite 500  
 9 Washington, DC 20006-1047  
 Telephone: (202) 223-7300  
 10 Facsimile: (202) 223-7420

11 DURIE TANGRI LLP  
 Sonal N. Mehta (SBN 222086)  
 12 smehta@durietangri.com  
 Alexandra H. Moss (SBN 302641)  
 13 amoss@durietangri.com  
 217 Leidesdorff Street  
 14 San Francisco, CA 94111  
 Telephone: (415) 362-6666  
 15 Facsimile: (415) 236-6300

16 Attorneys for Defendant  
 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,  
 24  
 v.  
 25  
 GOOGLE INC.  
 26  
 Defendant.  
 27

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. (“WTI”) 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 Defendant Google Inc. (“Google”) and WTI previously submitted a joint  
7 stipulation (Dkt. 125) requesting a modification in the hearing date and briefing schedule for this  
8 motion so that it could be heard together with a cross-motion to strike WTI’s infringement  
9 contentions that Google informed WTI it intended to bring;

10 WHEREAS the Court granted this stipulation, as modified (Dkt. 126), and set the hearing  
11 date for May 18, 2016; the due date for Google’s opposition to WTI’s motion to April 19, 2016;  
12 and the due date for WTI’s reply to May 4, 2016;

13 WHEREAS counsel for Google is not available for a hearing on May 18, 2016;

14 WHEREAS counsel for Google contacted the calendar clerk on April 13, 2016, to inquire  
15 about the Court’s schedule and the calendar clerk informed Google that the Court is not available  
16 for the hearing on May 25 or June 1, 2016;

17 WHEREAS Google and WTI agree that hearing WTI’s Motion for Leave to Amend  
18 Infringement Contentions and Google’s cross-motion to strike plaintiff’s infringement  
19 contentions at the same time would be more efficient for both the Court and the parties and that a  
20 modified hearing date of June 8, 2016, would permit these motions to be heard at the same time;

21 WHEREAS Google and WTI now request that the hearing date be moved to June 8,  
22 2016;

23 WHEREAS, in the alternative, if more convenient for the Court, Google and WTI also  
24 agree that the hearing date could be set for the same date as the claim construction tutorial  
25 currently scheduled in this action, June 10, 2016;

26 WHEREAS Google and WTI agree that there is good cause for modifying the briefing  
27 schedule for WTI’s Motion for Leave to Amend Infringement Contentions (Dkt. 116), and WTI  
28 and Google now request that Google’s opposition to WTI’s Motion for Leave to Amend

1 Infringement Contentions be filed by Wednesday, April 27, 2016, and WTI's reply in support of  
2 WTI's Motion for Leave to Amend Infringement Contentions be filed by Wednesday, May 18,  
3 2016; and

4 WHEREAS the parties' stipulation does not change any other dates in the current  
5 schedule and does not accelerate or extend any other time frames set in the Local Rules or in the  
6 Federal Rules;

7 IT IS STIPULATED AND REQUESTED that, subject to the Court's approval, the  
8 hearing date for Plaintiff's Motion for Leave to Amend Infringement Contentions be June 8,  
9 2016, or in the alternative, at the Court's preference, June 10, 2016; that Google's opposition to  
10 WTI's Motion for Leave to Amend Infringement Contentions be due April 27, 2016; that WTI's  
11 reply in support of WTI's Motion for Leave to Amend Infringement Contentions be due May 18,  
12 2016.

13  
14 Dated: April 14, 2016

15  
16 Respectfully submitted,

17 By: /s/ Steve Daniels  
Steven R. Daniels

By: /s/ Nicholas Groombridge  
Nicholas Groombridge

18 Steven R. Daniels (CA Bar 235398)  
19 George W. Webb III (admitted *pro hac vice*)  
20 Jonathan D. Baker (CA Bar 196062)  
21 Michael D. Saunders (CA Bar 259692)  
22 Gurtej Singh (CA Bar 286547)  
23 FARNEY DANIELS LLP  
24 411 Borel Ave., Suite 350  
25 San Mateo, CA 94402  
26 Telephone: (424) 268-5200  
27 Facsimile: (424) 268-5219  
sdaniels@farneydaniels.com  
gwebb@farneydaniels.com  
jbaker@farneydaniels.com  
msaunders@farneydaniels.com  
tsingh@farneydaniels.com

DURIE TANGRI LLP  
Sonal N. Mehta (SBN 222086)  
smehta@durietangri.com  
Alexandra H. Moss (SBN 302641)  
amoss@durietangri.com  
217 Leidesdorff Street  
San Francisco, CA 94111  
Telephone: (415) 362-6666  
Facsimile: (415) 236-6300

PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP  
David J. Ball Jr. (admitted *pro hac vice*)  
dball@paulweiss.com  
David K. Stark (SBN 279089)  
dstark@paulweiss.com

1 *Attorneys for Plaintiff*  
2 *Word to Info, Inc.*

2001 K Street, NW, Suite 500  
Washington, DC 20006-1047  
Telephone: (202) 223-7300  
Facsimile: (202) 223-7420

4 PAUL, WEISS, RIFKIND, WHARTON  
5 & GARRISON LLP

6 Nicholas Groombridge (admitted *pro hac*  
7 *vice*)

8 ngroombridge@paulweiss.com  
9 Jenny C. Wu (admitted *pro hac vice*)  
10 jcwu@paulweiss.com

11 1285 Avenue of the Americas  
12 New York, NY 10019-6064  
13 Telephone: (212) 373-3000  
14 Facsimile: (212) 757-3990

15 *Attorneys for Defendant*  
16 *Google Inc.*

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

18 In accordance with Civil Local Rule 6-2, I declare that good cause supports the parties'  
19 stipulated request for modifying the hearing date for Plaintiff Word to Info, Inc.'s Motion for  
20 Leave to Amend Infringement Contentions to June 8, 2016, or in the alternative at the Court's  
21 preference, June 10, 2016; setting the due date for Google's opposition to WTI's Motion for  
22 Leave to Amend Infringement Contentions to April 27, 2016; and setting the due date for WTI's  
23 reply in support of WTI's Motion for Leave to Amend Infringement Contentions to May 18,  
24 2016. The requested modifications will permit Google Inc.'s forthcoming cross-motion to strike  
25 Plaintiff's infringement contentions and WTI's Motion for Leave to Amend Infringement  
26 Contentions to be heard at the same time.

27 The parties previously stipulated to an extension of time to the date of February 12, 2016,  
28 for Facebook, Inc. to serve its Invalidity Contentions; the date of February 19, 2016, for Google  
Inc. to serve its Invalidity Contentions; the date of February 26, 2016, for the Exchange of  
Proposed Terms for Claim Construction; and the date of March 4, 2016, for the Exchange of

1 Preliminary Constructions because Plaintiff and Defendant Google Inc. were meeting and  
2 conferring regarding Plaintiff's Infringement Contentions. The Court entered its order granting  
3 this stipulation on February 26, 2016.

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

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

11 The parties also previously agreed to modify the hearing date for WTI's Motion for  
12 Leave to Amend Infringement Contentions from May 11, 2016, to May 25, 2016; the due date  
13 for Google's opposition to that motion to April 19, 2016; and the due date for WTI's reply in  
14 support of that motion to May 4, 2016. The Court granted this stipulation, as modified, and set  
15 the hearing date to May 18, 2016.

16 The current stipulated request does not change any other dates in the current schedule,  
17 including the scheduled claim construction hearing on June 17, 2016, and does not accelerate or  
18 extend any other time frames set in the Local Rules or in the Federal Rules.

19  
20 DATED: April 14, 2016

/s/ James Razick  
James Razick

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 14, 2016

/s/David Ball

**The hearing is set for the same date as the claim construction tutorial, June 10, 2016.**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: April 18, 2016



HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE