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5 UNITED STATES DISTRICT COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 SAN FRANCISCO DIVISION

8 LSI Corporation, Agere Systems LLC,
9 and Avago Technologies General (IP)
Singapore) Pte. Ltd.

10 Plaintiffs,

11 v.

12 Funai Electric Co., Ltd.; Funai
13 Corporation, Inc.; P&F USA, Inc.; and
Funai Service Corporation,

14 Defendants.

CASE NO. 15-CV-04307-EMC

**[PROPOSED] STIPULATION &
ORDER RE: CONTINUATION OF
DEADLINE FOR DEFENDANTS'
PATENT L.R. 3-4 DISCLOSURES**

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16 WHEREAS, Plaintiffs LSI Corporation, Agere Systems LLC, and Avago
17 Technologies General (IP) Singapore Pte. Ltd. (collectively “Avago”) and
18 Defendants Funai Electric Co., Ltd.; Funai Corporation, Inc.; P&F USA, Inc.; and
19 Funai Service Corporation (collectively “Funai”) have stipulated to a one-week
20 continuation of the current December 14, 2015 deadline for Funai’s disclosures
21 under Patent L.R. 3-4—Funai’s document production accompanying invalidity
22 contentions. The current December 14, 2015 deadline was set by this Court’s
23 order, Dkt. No. 80. Funai and Avago are currently attempting to negotiate a
24 potential stipulation that may set forth a set of representative products for the larger
25 list of accused products identified in Avago’s Patent L.R. 3-1 infringement
26 contentions. This proposed stipulation, if agreed to by the parties and approved by
27 the Court, may improve judicial efficiency and reduce the burden on the Court, the
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1 jury, Avago and Funai, and may narrow the number of products that will require an
2 infringement analysis. The parties have not previously sought to modify this
3 deadline and the modification of this deadline will not affect any other deadlines in
4 this action.

5 Therefore, for the good cause shown above, it is hereby ORDERED that
6 Funai shall serve its Patent L.R. 3-4 disclosures on December 21, 2015.

7 **IT IS SO STIPULATED**, through Counsel of Record.

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9 Dated: December 14, 2015 /s/ Kevin W. Kirsch

10 KEVIN W. KIRSCH
11 kkirsch@bakerlaw.com
12 BAKER & HOSTETLER LLP
13 312 Walnut Street, Suite 3200
14 Cincinnati, Ohio 45202-4074
15 Telephone: (513) 929-3499
16 Facsimile: (513) 929-0303

17 *Attorney for Defendants Funai Electric Co.,*
18 *Ltd.; Funai Corporation, Inc.; P&F USA,*
19 *Inc.; and Funai Service Corporation*

20 Dated: December 14, 2015 /s/ Matthew C. Holohan

21 Matthew Christian Holohan
22 mholohan@kilpatricktownsend.com
23 KILPATRICK TOWNSEND AND
24 STOCKTON LLP
25 1400 Wewatta Street Suite 600
26 Denver, CO 80202-5556
27 Phone: 303-405-8527
28 Fax: 303-648-4730

Attorney for Plaintiffs LSI Corporation,
Agere Systems LLC, and Avago Technologies
General IP (Singapore) Pte. Ltd.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED** that the forgoing
24 Agreement is approved.

25 Dated: December 15, 2015



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