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4 UNITED STATES DISTRICT COURT  
5 NORTHERN DISTRICT OF CALIFORNIA  
6  
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: FURTHER  
CONTINUATION OF DEADLINE  
FOR DEFENDANTS' PATENT L.R.  
3-4 DISCLOSURES**

15 WHEREAS, Plaintiffs LSI Corporation, Agere Systems LLC, and Avago  
16 Technologies General (IP) Singapore Pte. Ltd. (collectively "Avago") and  
17 Defendants Funai Electric Co., Ltd.; Funai Corporation, Inc.; P&F USA, Inc.; and  
18 Funai Service Corporation (collectively "Funai") have stipulated to an additional  
19 one-week continuation of the current December 21, 2015 deadline for Funai's  
20 disclosures under Patent L.R. 3-4—Funai's document production accompanying  
21 invalidity contentions. The current December 21, 2015 deadline was set by this  
22 Court's order, Dkt. No. 104. Funai and Avago are currently attempting to negotiate  
23 a potential stipulation that may set forth a set of representative products for the  
24 larger list of accused products identified in Avago's Patent L.R. 3-1 infringement  
25 contentions. The parties have exchanged drafts of the stipulation, but are still  
26 working toward finalizing the specific terms of the stipulation.

27 Again, this proposed stipulation, if agreed to by the parties and approved by  
28

1 the Court, may improve judicial efficiency and reduce the burden on the Court, the  
2 jury, Avago and Funai, and may narrow the number of products that will require an  
3 infringement analysis. The parties have previously stipulated to modify this  
4 deadline by one-week, which was entered by this Court in Dkt. No. 104. Further  
5 modification of this deadline by one week will not affect any other deadlines in this  
6 action. Therefore, for the good cause shown above, it is hereby ORDERED that  
7 Funai shall serve its Patent L.R. 3-4 disclosures on December 28, 2015.

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

9  
10 Dated: December 18, 2015

/s/ Kevin W. Kirsch

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Ltd.; Funai Corporation, Inc.; P&F USA,  
Inc.; and Funai Service Corporation*

18 Dated: December 18, 2015

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

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

Dated: December 21, 2015

UNITED STATES DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
UNITED STATES DISTRICT COURT DISTRICT JUDGE



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