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

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 LSI CORPORATION, AGERE SYSTEMS
 13 LLC and AVAGO TECHNOLOGIES
 GENERAL IP
 14 (SINGAPORE) PTE. LTD.,

15 Plaintiffs,

16 v.

17 FUNAI ELECTRIC COMPANY, LTD.;
 18 FUNAI CORPORATION, INC.; FUNAI
 SERVICE CORPORATION; and P&F USA,
 19 INC.,

20 Defendants.

CASE NO. 15-CV-04307-EMC

21 STIPULATION AND [PROPOSED] ORDER
 22 TO REQUEST TRANSFER OF THE ITC
 23 RECORD TO THE DISTRICT COURT

24 WHEREAS, this case was stayed pursuant to the Order of May 31, 2012, pending resolution
 25 of Inv. No. 337-TA-837 at the International Trade Commission;

26 WHEREAS, on May 12, 2015, the United States Court of Appeals for the Federal Circuit
 27 issued its mandate resolving the 837 Investigation, thereby terminating the stay;

28 WHEREAS, 28 U.S.C. § 1659(b) states,

Notwithstanding section 337(n)(1) of the Tariff Act of 1930, after
 dissolution of a stay under subsection (a), the record of the proceeding
 before the United States International Trade Commission shall be

STIPULATION AND [PROPOSED] ORDER TO REQUEST TRANSFER OF THE ITC
 RECORD TO THE DISTRICT COURT

1 transmitted to the district court and shall be admissible in the civil
2 action, subject to such protective order as the district court determines
3 necessary, to the extent permitted under the Federal Rules of
4 Evidence and the Federal Rules of Civil Procedure;

5 NOW, THEREFORE, the parties hereby agree and stipulate as follows:

- 6 1. The complete record of the proceedings before the United States International Trade
7 Commission in Inv. No. 337-TA-837 shall be transmitted to the United States District
8 Court for the Northern District of California, civil action 15-CV-04307-EMC. Plaintiffs
9 LSI Corporation and Agere Systems LLC will file this Order with the International
10 Trade Commission.
11 *within a week of the date of this order,*
12 2. The parties will notify every third party, including every respondent other than Funai
13 Electric Company, Ltd., Funai Corporation, Inc., Funai Service Corporation, and P&F
14 USA, Inc., from the ITC case of the transfer order. The parties' notice shall include: (a)
15 a copy of this order and (b) a copy of the Protective Order governing this litigation.
16 3. Upon receipt of the ITC record, this Court will restrict distribution of the ITC record for
17 ²⁸~~14~~ days to outside counsel only in order to provide an opportunity for any third party to
18 move for a protective order.
19 4. After the ²⁸~~14~~ day period, the Protective Order issued by this Court will govern the ITC
20 production, as set forth in 19 C.F.R. § 210.39(b) except to the extent that a third party
21 filed a motion concerning its documents. To the extent that a third party filed a motion
22 concerning its documents, treatment of documents subject to such motion shall be
23 governed by any order resolving such motion.

24 DATED: October 9, 2015

KILPATRICK TOWNSEND & STOCKTON LLP

25 By: /s/ David E. Sipiora

26 DAVID E. SIPIORA

27 *Attorneys for Plaintiffs*

28 *LSI Corporation, Agere Systems Inc. and Avago
Technologies General IP (Singapore) Pte. Ltd.*

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DATED: October 9, 2015

BAKER & HOSTETLER LLP

By: /s/ Kevin W. Kirsch

KEVIN W. KIRSCH

Attorneys for Defendants

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

IT IS SO ORDERED



DATED: 10/13/15

By: _____

UNITED STATES JUDGE

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