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SRAM, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FOX FACTORY, INC.,

Plaintiff,

v.

SRAM, LLC,

Defendant.

RELATED CASE NOS.
3:16-cv-00506-WHO AND
5:16-cv-03716-WHO

**JOINT STIPULATION AND
ORDER**

1 On July 18, 2016, the Court entered a stipulated Order to relate *FOX Factory, Inc. v. SRAM,*
2 *LLC*, Case Nos. 3:16-cv-00506-WHO and 5:16-cv-03716-WHA (now -WHO), which contained a
3 stipulated case schedule to synchronize dates in both cases through claim construction. Dkt. 35
4 (Case No. 3:16-cv-00506-WHO). In that stipulation, the parties respectfully suggested that a Case
5 Management Conference be set “in the next few weeks” to schedule further dates for fact discovery,
6 expert discovery, dispositive motions, and trial. *Id.* at 1. Although the parties were anticipating a
7 CMC in approximately August 2016, the Court set the next CMC for August 22, 2017.¹ The parties
8 agree that, with the Court’s permission, it would be beneficial to convene an earlier CMC in both
9 cases to discuss a mediation schedule and to set dates for fact discovery, expert discovery,
10 dispositive motions, and trial.

11 Accordingly, the parties HEREBY STIPULATE AND JOINTLY REQUEST that the Court
12 set a CMC on **August 23 or 30, 2016, or September 20, 2016**, when counsel for both parties are
13 available, and that counsel will file a joint case management conference statement at least seven days
14 before the CMC.

26
27 ¹ Lead counsel for Plaintiff FOX Factory intended to request in the stipulation that the
28 conference not be set on Tuesday, August 16, 2016, due to a previously scheduled family vacation,
29 but inadvertently referred to August 16, 2017 instead, which may have been confusing to the Court.

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By signature below, counsel for Plaintiff attests the counsel for Defendant concurs in the filing of this document.

Dated: July 28, 2016

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP

By: /s/ Robert F. McCauley
Robert F. McCauley
Attorneys for Plaintiff
FOX Factory, Inc.

Dated: July 28, 2016

SHARTSIS FRIESE LLP

By: /s/ Erick C. Howard
Erick C. Howard
Attorneys for Defendant
SRAM, LLC

PROPOSED ORDER

1
2 PURSUANT TO STIPULATION, a Case Management Conference in *FOX Factory, Inc. v.*
3 *SRAM, LLC* related cases 3:16-cv-00506-WHO and 5:16-cv-03716-WHO will be held before the
4 Honorable William H. Orrick on 8/23/2016 at 2:00 p.m. in Courtroom 2, 17th Floor, 450
5 Golden Gate Avenue, San Francisco, CA 94102. Counsel for the parties are ORDERED to file a
6 Joint Case Management Conference Statement at least seven days before the conference.

7 IT IS SO ORDERED.

8
9
10 Dated: July 29, 2016



11

12 The Honorable William H. Orrick
13 United States District Judge
14 Northern District of California