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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CHRIMAR SYSTEMS, INC., et al.,

Plaintiffs,

vs.

JUNIPER NETWORKS, INC.,

Defendant.

Case No. 3:16-cv-00558-SI

STIPULATION AND ~~[PROPOSED]~~ ORDER TO RESCHEDULE CASE MANAGEMENT CONFERENCE

In accordance with Civil Local Rules 6-2 and 7-12, Plaintiffs Chrimar Systems, Inc. and Chrimar Holding Company (collectively, "Chrimar") and Defendant Juniper Networks, Inc. ("Juniper"), by and through their respective counsel, hereby stipulate and agree as follows:

On July 1, 2015, Chrimar filed suit against various defendants in the Eastern District of Texas alleging infringement of U.S. Patent Nos. 8,155,012, 8,942,107, 8,902,760, and 9,019,838 (collectively, the "Patents-in-Suit").

Four of the cases have been transferred to the Northern District of California, and are

presently before this Court: *Chrimar Systems, Inc. et al. v. Juniper Networks, Inc.*, Case No. 3:16-cv-00558-SI (N.D. Cal.); *Chrimar Systems, Inc. et al. v. Ruckus Wireless, Inc.*, Case No. 3:16-cv-186-SI (N.D. Cal.); *Chrimar Systems, Inc. et al. v. NETGEAR, Inc.*, Case No. 3:16-cv-624-SI (N.D. Cal.); *Chrimar Systems, Inc. et al. v. Fortinet, Inc.*, Case No. 3:16-cv-00897-SI (N.D. Cal.) (collectively, the "N.D. Cal. Chrimar Cases").

On March 24, 2016, the Court entered STIPULATION AND ORDER TO RESCHEDULE CASE MANAGEMENT CONFERENCE [Dkt. No. 39], setting the Case Management Conference ("CMC") for the four transferred cases to April 22, 2016.

Chrimar's lead counsel has developed a conflict with the April 22, 2016 CMC setting. In particular, in related litigation currently pending in the Eastern District of Texas, Chrimar is subject to an April 25, 2016, deadline for the close of fact discovery. At the time it submitted the previous stipulation setting the CMC for April 22, Chrimar believed that the depositions in the Texas case could be scheduled so as to not interfere with the CMC. Since that time, however, Chrimar has learned that because of witness availability issues, two depositions in the Texas case must proceed on April 22 in Dallas, Texas. Because of those depositions, Chrimar's lead counsel, Justin Cohen, and associate counsel, Richard Wynne, are unavailable to attend the CMC on that date.

While mindful of this Court's scheduling, rather that requesting leave to proceed with the CMC without the presence of lead counsel, Chrimar contacted the Defendants in each of the N.D. Cal. Chrimar Cases to inquire about rescheduling the CMC. Counsel for the parties in all of the N.D. Cal. Chrimar Cases have conferred and are agreeable to continuing the CMC until a date when Chrimar's lead counsel is available.

Having discussed the matter, the parties in all N.D. Cal. Chrimar Cases are available for a CMC on May 13, 2016. Accordingly, if the Court's schedule permits, counsel for the parties in this action have agreed to reschedule the CMC currently set for April 22, 2016, to May 13, 2016, at 2:30 p.m.

Because the Court has not entered a Scheduling Order in any of the four N.D. Cal. Chrimar Cases, the requested time modification will have no effect on the schedule for this or any

of the cases.

IT IS HEREBY AGREED AND STIPULATED, that the CMC in this case shall be rescheduled to May 13, 2016, at 2:30 p.m. and the related deadlines for filing a joint CMC statement is adjusted to May 6, 2016. Further, the parties shall file either a Stipulation to ADR Process or Notice of Need for ADR Phone Conference not later than April 22, 2016.

Respectfully submitted,	Respectfully submitted,
/s/ *Richard L. Wynne, Jr.* Richard L. Wynne, Jr. Thompson & Knight LLP	/s/ *Talin Gordnia w/perm R. Wynne* Talin Gordnia IRELL & MANELLA LLP
Counsel for Plaintiffs	*Counsel for Defendant Juniper Networks, Inc.*

CERTIFICATE OF SERVICE

Case No. 3:16-cv-00558-SI

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 707 Wilshire Blvd., Suite 4100, Los Angeles, CA 90017. On April 12, 2016 I served documents described as follows:

Stipulation and [Proposed] Order to Reschedule Case Management Conference

I served the document listed above on the interested parties below, using the following means:

[X] (By Court's CM/ECF System) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed on the CM/ECF service list.

I declare under penalty of perjury under 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on April 12, 2016, at Los Angeles, California.

/s/ *Bruce J. Zabarauskas*
Bruce J. Zabarauskas

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 4/18, 2016

THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE