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 NETGEAR, Inc.*

17 **UNITED STATES DISTRICT COURT**
 18 **NORTHERN DISTRICT OF CALIFORNIA**
 19 **SAN FRANCISCO DIVISION**

20 CHRIMAR SYSTEMS, INC., et al.,

21 Plaintiffs,

22 vs.

23 NETGEAR, INC.,

24 Defendant.

Case No. 3:16-cv-00624-SI

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

25
 26
 27 In accordance with Civil Local Rules 6-2 and 7-12, Plaintiffs Chrimar Systems, Inc. and

1 Chrimar Holding Company (collectively, “Chrimar”) and Defendant NETGEAR, Inc.
2 (“NETGEAR”), by and through their respective counsel, hereby stipulate and agree as follows:

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

6 Four of the cases have been transferred to the Northern District of California, and are
7 presently before this Court: *Chrimar Systems, Inc. et al. v. Juniper Networks, Inc.*, Case No. 3:16-
8 cv-00558-SI (N.D. Cal.); *Chrimar Systems, Inc. et al. v. Ruckus Wireless, Inc.*, Case No. 3:16-cv-
9 186-SI (N.D. Cal.); *Chrimar Systems, Inc. et al. v. NETGEAR, Inc.*, Case No. 3:16-cv-624-SI
10 (N.D. Cal.); *Chrimar Systems, Inc. et al. v. Fortinet, Inc.*, Case No. 3:16-cv-00897-SI (N.D. Cal.)
11 (collectively, the “N.D. Cal. Chrimar Cases”).

12 The Court has set the four N.D. Cal. Chrimar cases for case management conferences
13 (“CMCs”) on four separate dates: April 15, 2016 (Case No. -897); April 22, 2016 (Case No. 186);
14 May 6, 2016 (Case No. -558); and May 20, 2016 (Case No. -624).

15 Counsel for the parties in all of the N.D. Cal. Chrimar Cases have conferred and believe
16 that there would be benefits to the Court and the parties to schedule the CMCs for all of the cases
17 scheduled on the same date, and at the Court’s convenience, at the same time if possible.

18 Counsel for the parties in all of the N.D. Cal. Chrimar Cases are available for CMC on
19 April 22, 2016, which is the date the Court had set the CMC for the *Chrimar v. Ruckus* case (No.
20 3:16-cv-186). Accordingly, if the Court’s schedule permits, counsel for the parties in this action
21 have agreed to reschedule the CMC currently set for May 20, 2016, to April 22, 2016, at or near
22 2:30 p.m., when the Ruckus CMC is currently scheduled.

23 No prior changes to the schedule have been made since this action was transferred to this
24 Court.

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

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IT IS HEREBY AGREED AND STIPULATED, that the CMC in this case shall be rescheduled to April 22, 2016, at 2:30 p.m. and the related deadline for filing a joint CMC statement is adjusted to April 15, 2016.

Respectfully submitted,

/s/ Richard L. Wynne, Jr.
Richard L. Wynne, Jr.
Thompson & Knight LLP

Counsel for Plaintiffs

Respectfully submitted,

/s/ Matthew S. Yungwirth w/perm. R. Wynne
Matthew S. Yungwirth
Duane Morris LLP

Counsel for Defendant NETGEAR, Inc.

1 **CERTIFICATE OF SERVICE**

2 **Case No. 3:16-cv-00624-SI**

3
4 STATE OF TEXAS, COUNTY OF DALLAS

5 I am employed in the County of Dallas, State of Texas. I am over the age of 18 and not a
6 party to the within action. My business address is 1722 Routh Street, Suite 1500, Dallas, Texas
75201. On April 21, 2015, I served documents described as follows:

7 **Stipulation and [Proposed] Order to Reschedule Case Management Conference**

8
9 I served the document listed above on the interested parties below, using the following
10 means:

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

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

16 Executed on March 18, 2016, at Dallas, Texas.

17 /s/ Richard L. Wynne, Jr.
18 Richard L. Wynne, Jr.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 23, 2016



THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE