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INTERNATIONAL TEST SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISIONINTERNATIONAL TEST SOLUTIONS, INC.,
Plaintiff,

v.

MIPOX INTERNATIONAL CORP., et al.
Defendants.

Case No. 3:16-cv-00791-RS

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DATES IN
SCHEDULING ORDER**MIPOX CORPORATION,
Counter-Plaintiff,

v.

INTERNATIONAL TEST SOLUTIONS, INC.,
Counter-Defendant.

STIPULATION AND [PROPOSED] ORDER

Pursuant to Local Rules 6-2 and 7-12, Plaintiff International Test Solutions, Inc., (“ITS”) and Defendants Mipox Corporation (“Mipox”), Mipox International Corporation (“MIC”), and MGN International, Inc. (“MGN”) (collectively, “Parties”), through their respective undersigned counsel, hereby stipulate¹ and request an order to continue the dates in the operating scheduling order (Dkt. No. 127) as set forth below. The requested continuance of dates would allow the Parties to focus on finalizing a written settlement agreement that is in progress. Accordingly, the Parties hereby stipulate through their respective counsel of record as follows:

WHEREAS, on May 18, 2017, this Court entered the operating case management scheduling order (Dkt. No. 127);

WHEREAS, on August 1, 2017, the Parties participated in a successful mediation session (Dkt. No. 135);

WHEREAS, the Parties believe a settlement is likely imminent and have been working toward finalizing a written settlement agreement;

WHEREAS, the Parties wish to focus on finalizing a written settlement agreement;

IT IS HEREBY STIPULATED by and between the Parties hereto that the operating case management scheduling order be modified as follows:

Event	Current Deadline	Stipulated Proposed Deadline
Complete Non-Expert Discovery	September 29, 2017	November 28, 2017
Exchange of Expert Reports	October 27, 2017	December 28, 2017
Exchange of Rebuttal Expert Reports	December 1, 2017	January 15, 2018
Complete Expert Discovery	January 12, 2018	February 12, 2018
Further Case Management Conference	October 5, 2017 at 10:00 a.m.	December 7, 2017 at 10:00 a.m.
Hearing for Pretrial Motions	March 29, 2018	April 26, 2018
Final Pretrial Conference	May 24, 2018 at 10:00 a.m.	May 24, 2018 at 10:00 a.m. (No Change)
Trial	June 4, 2018 at 9:00 a.m.	June 4, 2018 at 9:00 a.m. (No Change)

¹ The parties previously stipulated to extend time for disclosure of invalidity contentions (Dkt. No. 39), to extend time for the parties’ joint claim construction and prehearing statement (Dkt. No. 44), to extend the time for filing of the opening claim construction brief (Dkt. No. 57), and to extend the time for responsive and reply claim construction briefs (Dkt. No. 64). The Court previously granted a Motion for Leave to Amend Complaint and continued the Markman hearing (Dkt. No. 70). Finally, Magistrate Judge Spero granted the Parties’ request for continuances of a court-ordered meet and confer relating to a discovery dispute issue. (Dkt. Nos. 137 and 141).

1 Dated: September 8, 2017

WINSTON & STRAWN LLP

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By: /s/ David S. Bloch

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David S. Bloch
Amanda L. Groves

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James C. Lin
Attorneys for Plaintiff

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International Test Solutions, Inc.

7 Dated: September 8, 2017

BARNES & THORNBURG LLP

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By: /s/ Roya Rahmanpour

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Thomas J. Donovan
Mark A. Hagedorn

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Roya Rahmanpour
Attorneys for Defendants Mipox Corp.,

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Mipox International Corp. and MGN
International, Inc.

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CONCURRENCE IN FILING

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I, Roya Rahmanpour, hereby attest that the concurrence to the filing of this document has
15 been obtained from each signatory hereto.

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Dated: September 8, 2017

/s/ Roya Rahmanpour

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Roya Rahmanpour

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

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Dated: 9/8/17



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Richard Seeborg

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UNITED STATES DISTRICT JUDGE

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