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16 **UNITED STATES DISTRICT COURT**  
 17 **NORTHERN DISTRICT OF CALIFORNIA**

19 INTERNATIONAL TEST SOLUTIONS,  
 20 INC.,

21 Plaintiff,

22 v.

23 MIPOX INTERNATIONAL  
 24 CORPORATION and MGN  
 25 INTERNATIONAL, INC.,

26 Defendant.

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

**STIPULATION AND [~~PROPOSED~~] ORDER  
 TO EXTEND TIME TO DISCLOSE  
 INVALIDITY CONTENTIONS**

1 Pursuant to Local Rules 6-2 and 7-12, Plaintiff International Test Solutions, Inc., (“ITS”)  
2 and Defendants Mipox International Corporation (“Mipox”) and MGN International, Inc.  
3 (“MGN”) (collectively, “Parties”), through their respective undersigned counsel, hereby stipulate  
4 and request an order extending the due date for Defendant Mipox and MGN’s Patent L.R. 3-3  
5 Invalidation Contentions and Patent L.R. 3-4 Document Productions Accompanying Disclosure of  
6 Invalidation Contentions by two weeks, from July 25, 2016 to August 8, 2016. This extension of time  
7 will provide Mipox and MGN the time necessary to prepare and complete the Invalidation  
8 Contentions and accompanying production. The requested time modification would change no  
9 other due dates and would have no effect on the remaining schedule for the case. Accordingly, the  
10 Parties hereby stipulate through their respective counsel of record as follows:

11 WHEREAS, pursuant to the Court’s Case Management Scheduling Order entered May 26,  
12 2016, and pursuant to the Patent Local Rules, the current due date for the Mipox and MGN’s  
13 Invalidation Contentions and accompanying production of documents is July 25, 2016; and

14 WHEREAS, the Mipox and MGN require additional time to prepare their Document  
15 Productions Accompanying Disclosure of Invalidation Contentions and Invalidation Contentions, and  
16 ITS, through its counsel of record, has agreed to extend the due date for Document Productions  
17 Accompanying Disclosure of Invalidation Contentions and Invalidation Contentions the by two weeks,  
18 from July 25, 2016 to August 8, 2016;

19 IT IS HEREBY STIPULATED by and between the Parties hereto that Mipox and MGN  
20 shall have to and including August 8, 2016, to serve their Document Productions Accompanying  
21 Disclosure of Invalidation Contentions and Invalidation Contentions.  
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Dated: July 22, 2016

WINSTON & STRAWN LLP

By: /s/ Amanda L. Groves  
Amanda L. Groves  
Attorneys for Plaintiff  
International Test Solutions, Inc.

Dated: July 22, 2016

BARNES & THORNBURG LLP

By: /s/ Roya Rahmanpour  
Thomas J. Donovan  
Roya Rahmanpour  
Attorneys for Defendants  
Mipox International Corporation and MGN  
International, Inc.

**CONCURRENCE IN FILING**


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

Dated: July 22, 2016

/s/ Roya Rahmanpour  
Roya Rahmanpour

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 7/22/16

  
Richard Seeborg  
UNITED STATES DISTRICT JUDGE