

Bruce J. Zabarauskas, SBN. 248601  
 THOMPSON & KNIGHT LLP  
 707 Wilshire Blvd., Suite 4100  
 Los Angeles, California 90017  
 Telephone: (310) 203-6902  
 Facsimile: (310) 203-6980  
 Email: bruce.zabarauskas@tklaw.com

Justin S. Cohen (*pro hac vice*)  
 Richard L. Wynne, Jr. (*pro hac vice*)  
 THOMPSON & KNIGHT LLP  
 1722 Routh Street, Suite 1500  
 Dallas, Texas 75201  
 Telephone: (214)969-1700  
 Facsimile: (214)969-1751  
 Email: justin.cohen@tklaw.com  
 Email: richard.wynne@tklaw.com

*Attorneys for Plaintiffs*

QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP  
 John M. Neukom (275887)  
 Andrew M. Holmes (260475)  
 50 California Street, 22nd Floor  
 San Francisco, California 94111  
 Telephone: (415) 875-6600  
 Facsimile: (415) 875-6700  
 Email: johnneukom@quinnemanuel.com  
 Email: drewholmes@quinnemanuel.com

*Attorneys for Defendant  
 Fortinet, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

CHRIMAR SYSTEMS, INC., et al.,

Plaintiffs,

vs.

FORTINET, INC.,

Defendant.

Case No. 3:16-cv-00897-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 Fortinet, Inc. (“Fortinet”), 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

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

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

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

12 Counsel for the parties in all of the N.D. Cal. Chrimar Cases are available for CMC on  
13 April 22, 2016, which is the date the Court had set the CMC for the *Chrimar v. Ruckus* case (No.  
14 3:16-cv-186). Accordingly, if the Court’s schedule permits, counsel for the parties in this action  
15 have agreed to reschedule the CMC currently set for April 15, 2016, to April 22, 2016, at or near  
16 2:30 p.m., when the Ruckus CMC is currently scheduled.

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

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

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

1 Respectfully submitted,

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

5 *Counsel for Plaintiffs*

Respectfully submitted,

/s/ John M. Neukom w/permission R. Wynne  
John M. Neukom (275887)  
Quinn Emanuel Urquhart & Sullivan, LLP

*Counsel for Defendant Fortinet, Inc.*

1 **CERTIFICATE OF SERVICE**

2 **Case No. 3:16-cv-00897-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  
7 75201. On April 21, 2015, I served documents described as follows:

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

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.

1  
2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

3  
4 Dated: March 22, 2016



5 THE HONORABLE SUSAN ILLSTON  
6 UNITED STATES DISTRICT JUDGE  
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