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7 Attorneys for Plaintiff
 GOPRO, INC.

8
 9 **UNITED STATES DISTRICT COURT**
 10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 11 **SAN FRANCISCO DIVISION**

13 GOPRO, INC.
 14 Plaintiff,
 15 v.
 16 C&A MARKETING, INC., C&A
 LICENSING, LLC, AND PLR IP
 17 HOLDINGS, LLC,
 18 Defendants.

Case No. 3:16-cv-03590-JST

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND TIME TO SERVE
 DAMAGES CONTENTIONS AND
 RESPONSIVE DAMAGES
 CONTENTIONS**

Complaint Filed: June 27, 2016

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 20 AND RELATED COUNTERCLAIMS

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1 Pursuant to Local Rule 6-1(b), Plaintiff GoPro, Inc. (“GoPro”) and Defendants C&A
2 Marketing, Inc.; C&A Licensing, LLC; and PLR IP Holdings, LLC (“Defendants”) hereby
3 stipulate as follows:

4 WHEREAS, the Northern District of California revised its Patent Local Rules on
5 January 17, 2017;

6 WHEREAS, these revised Patent Local Rules now require the exchange of Damages
7 Contentions and Responsive Damages Contentions under Patent Local Rule (“Patent L.R.”) 3-8
8 and 3-9, respectively;

9 WHEREAS, Patent L.R. 3-8 and 3-9 contemplate the prior identification of information
10 and production of documents relating to damages under Patent L.R. 3-1(h), 3-2(f)–(j), and 3-4(c)–
11 (e);

12 WHEREAS, GoPro previously served Infringement Contentions under Patent L.R. 3-1,
13 and the parties produced documents pursuant to Patent L.R. 3-2 and 3-4 prior to the revision of
14 the Patent Local Rules;

15 WHEREAS, the parties’ compliance with these new Patent Local Rules relating to
16 damages would assist their completion of Damages Contentions and Responsive Damages
17 Contentions;

18 IT IS HEREBY STIPULATED AND AGREED that on April 5, 2017, GoPro will serve
19 amended Infringement Contentions, amended only to “[i]dentify the timing of the point of first
20 infringement, the start of claimed damages, and the end of claimed damages,” pursuant to Patent
21 L.R. 3-1(h);

22 IT IS FURTHER STIPULATED AND AGREED that on April 5, 2017, the parties will
23 produce documents responsive to Patent L.R. 3-2(f)–(j) and 3-4(c)–(e) and in compliance with
24 Patent L.R. 3-2 and 3-4;

25 IT IS FURTHER STIPULATED AND AGREED that GoPro will serve its Patent L.R. 3-8
26 Damages Contentions on May 25, 2017 (50 days after service of its amended Infringement
27 Contentions);

1 IT IS FURTHER STIPULATED AND AGREED that Defendants will serve their Patent
2 L.R. 3-9 Responsive Damages Contentions on June 26, 2017 (30 days after service of the
3 Damages Contentions).

4 The parties previously stipulated to extend time to respond to the Complaint, to continue
5 the initial case management conference, and to serve invalidity contentions and exchange
6 preliminary claim constructions. This extension will not otherwise affect the schedule for the
7 case.

8 Dated: March 7, 2017

Dated: March 7, 2017

9 /s/ Mehrnaz Boroumand Smith

/s/ Nathan B. Sabri

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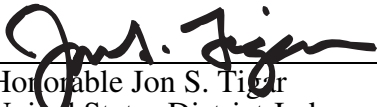
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Attorneys for Defendants C&A Marketing,
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Holdings, LLC

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: March 9, 2017



Honorable Jon S. Tiger
United States District Judge