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**ATTORNEYS FOR DEFENDANTS, CISCO
SYSTEM, INC. AND SOURCEFIRE LLC**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIR2US, INC.,

Plaintiff,

v.

CISCO SYSTEMS, INC. and
SOURCEFIRE LLC,

Defendant.

CASE NO. 3:16-cv-06988-VC

**JOINT STIPULATION TO AMEND CASE
SCHEDULE (DKT. 104)
AND ORDER**

1 Plaintiff Vir2us, Inc. (“Vir2us”) and Defendants Cisco Systems, Inc. and Sourcefire LLC
 2 (“Defendants”), after consultation with the Court, hereby stipulate and agree that—with the
 3 exception of Defendants’ supplemental response to Plaintiff’s Interrogatory No. 4, Defendants’
 4 agreed¹ supplemental production and identification of documents required by Patent Local Rule
 5 3-4(d), and the parties’ exchange of damages contentions pursuant to Patent Local Rule 3-8 and
 6 3-9 (collectively, the “Initial Damages Discovery Items”)—all other damages-related discovery
 7 shall be rescheduled to commence after the Court issues its claim construction and dispositive
 8 motion ruling(s) (collectively, “Dispositive Rulings”). Defendants’ supplemental response to
 9 Plaintiff’s Interrogatory No. 4 and agreed supplemental production of documents required by
 10 Patent Local Rule 3-4(d) shall include (to the extent not already produced, but maintained in the
 11 ordinary course of business) units sold, sales, revenue, cost, and profit information for each
 12 Accused Product² identified in Plaintiff’s Patent Local Rule 3-1(b) disclosure and shall cover the
 13 time-period of 2010 to present.

14 The parties stipulate and agree that the following deadlines shall apply to the Initial
 15 Damages Discovery Items:

Event	Deadline
Defendants’ supplemental response to Plaintiff’s Interrogatory No. 4 and Defendants’ agreed supplemental production of documents required by Patent Local Rule 3-4(d)	June 21, 2017

21 _____
 22 ¹ Plaintiff contends there are deficiencies in Defendants’ existing production and
 23 identification of documents required by Patent Local Rule 3-4(d). Defendants disagree. In an
 24 effort to resolve the dispute, Defendants have agreed to make a supplemental document
 production and identification of documents as part of its supplemental response to Plaintiff’s
 Interrogatory No. 4, which Defendants hope will moot the dispute. The parties reserve all rights
 regarding that dispute.

25 ² Defendants have objected to the definition of “Accused Products” set forth in Plaintiff’s
 26 Patent Local Rule 3-1(b) disclosure. Plaintiff has neither agreed nor acquiesced to those
 27 objections. Defendants will provide the categories of information described herein by June 21 in
 28 accordance with their objections. If Plaintiff believes those objections are improper or result in
 an improper narrowing or exclusion of products, then the parties shall confer after June 21, and
 Plaintiff maintains the right to raise any such unresolved dispute with the Court immediately
 following the meet-and-confer process.

Event	Deadline
Vir2us's amended disclosure of damages contentions (P.L.R. 3-8)	July 14, 2017
Defendants' disclosure of responsive damages contentions (P.L.R. 3-9)	August 4, 2017

The parties further stipulate and agree that following the issuance of the last of the Court's Dispositive Rulings related to claim construction and/or dispositive motions heard at the currently scheduled March 7, 2018 hearing, fact discovery relating only to damages issues shall recommence and last 60 days, to be followed by a 73-day period for expert discovery relating only to damages issues and then a 14-day period to file any *Daubert* motions related to damages issues. Accordingly, the following deadlines shall apply to the damages-related discovery period:

Event	Deadline
Damages-related fact discovery ends	60 days after the Court issues its final Dispositive Ruling
Vir2us's opening expert report on damages	10 days after damages-related fact discovery ends
Defendants' rebuttal expert report on damages	28 days after Vir2us's opening expert report on damages
Vir2us's reply expert report on damages	21 days after Defendants' rebuttal expert report on damages
Damages expert discovery ends	14 days after Vir2us's reply expert report on damages
<i>Daubert</i> motions on damages-related issues	14 days after close of damages expert discovery

1 The foregoing has been stipulated and agreed to by and among the parties, this 20th day
2 of June, 2017.

3 /s/ Brian A.E. Smith

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16 **ATTORNEYS FOR PLAINTIFF VIR2US,
17 INC.**

20 Date: June 22, 2017

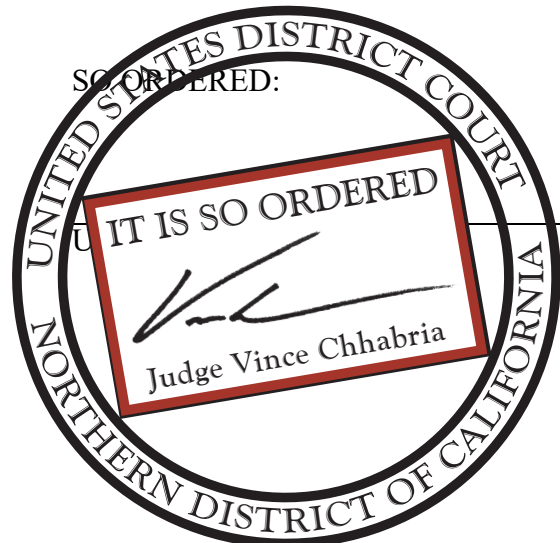
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ATTESTATION

Pursuant to Civil Local Rule 5-1, I hereby attest that I have obtained concurrence of the above noted signatories as indicated by a “conformed” signature (/s/) within this e-filed document.

Dated: June 20, 2017

/s/ Brian A.E. Smith
Brian A.E. Smith