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Attorneys for Plaintiff and Counterdefendant  
 ASIA VITAL COMPONENTS CO., LTD.

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 SAN FRANCISCO DIVISION

20 ASIA VITAL COMPONENTS CO., LTD.,  
 21 Plaintiff and  
 22 Counterdefendant,  
 23 v.  
 24 ASETEK DANMARK A/S  
 25 Defendant and  
 26 Counterclaimant.

CASE NO. 3:16-cv-07160-JST  
**STIPULATION REGARDING ACCESS  
 TO ASETEK'S CONFIDENTIAL  
 INFORMATION BY AVC'S COUNSEL  
 WEI LIN CHEN;**  
**~~PROPOSED~~ ORDER**

1 Plaintiff and Counterclaim Defendant Asia Vital Components Co., Ltd. (“AVC”) and  
2 Defendant and Counterclaimant Asetek Danmark A/S (“Asetek”), through their counsel of record,  
3 jointly stipulate as follows:

4 1. Attorney Wei Lin Chen, who has represented that he represents AVC in this  
5 case and is a member of the Bar of this Court, may have access to Asetek’s  
6 documents and information designated as CONFIDENTIAL and HIGHLY  
7 CONFIDENTIAL-ATTORNEYS’ EYES ONLY under the terms and  
8 restrictions for “Outside Counsel of Record” in the Northern District of  
9 California’s Patent Local Rule 2-2 Interim Model Protective Order  
10 (“Operative Protective Order,” found at  
11 <https://www.cand.uscourts.gov/model-protective-orders>) which governs this  
12 case, upon his signing and providing to Asetek’s counsel his signed  
13 Agreement and Acknowledgement to Be Bound (Exhibit A to the Operative  
14 Protective Order).

15 2. Jennifer Tan and Melody Foo (supporting staff of Zoomlaw to Mr. Chen),  
16 upon signing and providing to Asetek’s counsel with their signed Agreement  
17 and Acknowledgement to Be Bound, may similarly have access to Asetek’s  
18 documents and information designated as CONFIDENTIAL and HIGHLY  
19 CONFIDENTIAL-ATTORNEYS’ EYES ONLY under the terms and  
20 restrictions for “Outside Counsel of Record” under the Operative Protective  
21 Order. Other than Mr. Chen, Ms. Tan, and Ms. Foo, no other support staff,  
22 employee, consultant, or personnel working for, at, or employed by Zoomlaw  
23 Attorneys-At-Law (“Zoomlaw”), nor any other support staff working for or  
24 with Mr. Chen, may have any access to Asetek’s documents or information  
25 designated as CONFIDENTIAL or HIGHLY CONFIDENTIAL-  
26 ATTORNEYS’ EYES ONLY under the Operative Protective Order. Other  
27 than Mr. Wei Lin Chen, Zoomlaw attorneys who are not Outside Counsel of  
28 Record under the Operative Protective Order may not have access to Asetek’s

1 documents or information that Asetek has designated HIGHLY  
2 CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Operative  
3 Protective Order.

- 4  
5 3. For avoidance of doubt: 1) Mr. Wei Lin Chen, Ms. Jennifer Tan, and Ms.  
6 Melody Foo may not disclose (orally or otherwise), show, share, transfer, or  
7 provide access to Asetek's HIGHLY CONFIDENTIAL-ATTORNEYS'  
8 EYES ONLY documents or information to any other attorney, support staff,  
9 employee, consultant, or personnel working for, at, or employed by Zoomlaw;  
10 and 2) Mr. Wei Lin Chen, Ms. Jennifer Tan, and Ms. Melody Foo will  
11 securely store and maintain Asetek's CONFIDENTIAL and HIGHLY  
12 CONFIDENTIAL-ATTORNEYS' EYES ONLY documents and information  
13 so that they are not accessible to anyone else, including but not limited to any  
14 other attorney, support staff, employee, consultant, or personnel working for,  
15 at, or employed by at Zoomlaw.

16 Respectfully submitted,

17 Dated: October 5, 2018

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

19 By: /s/ Robert F. McCauley

20 Robert F. McCauley  
21 Attorneys for Defendant and Counterclaimant  
ASETEK DANMARK A/S

22 Dated: October 5, 2018

ARDENT LAW GROUP, PC

24 By: /s/ Hubert H. Kuo

25 Hubert H. Kuo  
26 Attorneys for Plaintiff ASIA VITAL COMPONENTS  
27 CO., LTD.  
28

1 Dated: October 5, 2018

SCHIFFER & BUUS APC

2  
3 By: /s/ William L. Buus

William L. Buus

4 Attorneys for Plaintiff ASIA VITAL COMPONENTS  
CO., LTD.

5 Dated: October 5, 2018

6  
7 By: /s/ Wei Lin Chen

Wei Lin Chen

8 Attorney for Plaintiff ASIA VITAL COMPONENTS  
CO., LTD.

9  
10 **ATTESTATION**

11 Counsel for Asetek Danmark A/S hereby attests by his signature below that concurrence in  
12 the filing of this document was obtained from counsel for Asia Vital Components Co., Ltd.

13 Dated: October 5, 2018

14 FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, LLP

15  
16 By: /s/ Robert F. McCauley

Robert F. McCauley

17 Attorneys for Defendant and Counterclaimant  
18 ASETEK DANMARK A/S  
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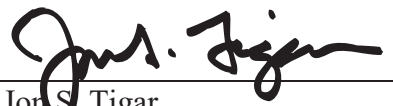
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, AND FOR GOOD CAUSE SHOWN, THE PARTIES'  
STIPULATION IS GRANTED.

IT IS SO ORDERED.

Dated: October 9, 2018

  
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Hon. Jon S. Tigar  
UNITED STATES DISTRICT JUDGE