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 Fashions Co., Ltd.
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15 UNITED STATES DISTRICT COURT
 16 NORTHERN DISTRICT OF CALIFORNIA

17 HUNTER DOUGLAS INC., et al.,
 18 Plaintiffs,
 19 vs.
 20 CHING FENG HOME FASHIONS CO., LTD.,
 21 Defendant.
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Case No. 3:17-cv-01069-RS

**JOINT STIPULATION AND ~~[PROPOSED]~~
 ORDER TO ENLARGE TIME FOR
 DEFENDANT CHING FENG HOME
 FASHIONS CO., LTD. TO SERVE
 INVALIDITY CONTENTIONS**

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1 WHEREAS, Plaintiffs Hunter Douglas, Inc., and Andrew J. Toti Testamentary Trust
2 (“Plaintiffs”) served their infringement contentions in the above-captioned matter on June 6, 2017;

3 WHEREAS, Defendant Ching Feng Home Fashions Co., Ltd. (“Defendant”) objected to
4 certain aspects of Plaintiffs’ infringement contentions, including, but not limited to: (1) Plaintiffs’
5 contentions fail to identify specific products and specific claims they infringe; (2) the infringement
6 contentions fail to provide adequate detail as to certain specific infringement contentions; (3)
7 Plaintiffs’ doctrine of the equivalents contentions are improper boilerplate; (4) Plaintiffs have not
8 identified any of their own products which practice the claimed inventions;

9 WHEREAS, Defendant has met and conferred with Plaintiffs regarding the objections above;

10 WHEREAS, Plaintiffs agree to amend their infringement contentions to identify the specific
11 claims that the previously identified products infringe, and to identify their own products which
12 practice the claimed inventions, and to amend one infringement contention relating to the ’051
13 patent;

14 WHEREAS, Plaintiffs do not agree, at this time, to amend their infringement contentions
15 related to their doctrine of equivalents contentions as they believe they have provided the required
16 information at this early stage of litigation, but reserve their rights to amend their doctrine of
17 equivalents contentions pursuant to the Local Rules;

18 WHEREAS, the parties agree that Plaintiffs shall move to amend their infringement
19 contentions by July 28, 2017;

20 WHEREAS, Defendant does not oppose Plaintiffs’ motion to amend their infringement
21 contentions as described herein;

22 WHEREAS, Defendant does not waive its right to move to strike Plaintiffs’ infringement
23 contentions regarding the doctrine of equivalents or other deficiencies therein, and/or move to
24 exclude the same at trial;

25 WHEREAS, the parties agree that Defendant’s invalidity contentions, currently due July 24,
26 2017, shall now be due three weeks from the date this Court issues an order on Plaintiffs’ motion to
27 amend their infringement contentions;

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Attorneys for Plaintiffs Hunter Douglas Inc. and Andrew J. Toti
Testamentary Trust

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

Dated: 7/20/17



Hon. Richard Seeborg

UNITED STATES DISTRICT JUDGE