

1 [Attorney Information Below]
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4 UNITED STATES DISTRICT COURT
5 FOR THE NORTHERN DISTRICT OF CALIFORNIA
6 SAN FRANCISCO DIVISION

7 APPLIED MATERIALS, INC.,

8 Plaintiff,

9 vs.

10 DR. URI COHEN,

11 Defendant.

Lead Case No. 3:17-cv-04990-EMC
Consolidated with
Case No. 3:17-cv-06451-EMC
Case No. 3:17-cv-05001-EMC

12 **STIPULATION AND [PROPOSED] ORDER
13 FOR FURTHER EXTENSION OF TIME TO
14 SUBMIT PROPOSED SCHEDULE AND
15 DISCOVERY PLAN**

16 Judge: Hon. Edward M. Chen

14 TSMC NORTH AMERICA; TAIWAN
15 SEMICONDUCTOR MANUFACTURING
16 COMPANY LIMITED,

17 Plaintiffs,

18 vs.

19 URI COHEN,

20 Defendant.

21 DR. URI COHEN,

22 Plaintiff,

23 vs.

24 TAIWAN SEMICONDUCTOR
25 MANUFACTURING COMPANY LTD.,
26 HUAWEI DEVICE USA INC., HUAWEI
27 DEVICE (DONGGUAN) CO. LTD.,

28 Defendant.

1 Pursuant to Civil L.R. 6-1(b) and 6-2, Applied Materials, Inc.; Dr. Uri Cohen; Taiwan
2 Semiconductor Manufacturing Company Limited; TSMC North America; Huawei Device USA Inc.;
3 Huawei Device (Dongguan) Co., Ltd.; Huawei Device Co., Ltd; and HiSilicon Technologies Co.,
4 Ltd., through their respective attorneys, hereby stipulate as follows:

5 WHEREAS, at the February 8, 2018 case management conference, the Court ordered the
6 parties to meet and confer and to submit a stipulated claim construction schedule and discovery plan
7 within two weeks, or February 22, 2018 (*see* Dkt. No. 70);

8 WHEREAS, the Court, at the parties' request, extended the deadline for submitting a
9 proposed schedule and discovery to February 26, 2018 (*see* Dkt. No. 75);

10 WHEREAS, the parties have continued to negotiate in good faith regarding a proposed
11 schedule and discovery plan, including one that, at Defendants' request, accounts for the recently
12 filed inventorship dispute, *Tzanavaras v. Cohen*, Case No. 18-cv-01052-SK (N.D. Cal.);

13 WHEREAS, the parties believe that one additional week is necessary to complete the meet-
14 and-confer process;

15 WHEREAS, in the event the parties cannot reach agreement on a fully stipulated case
16 schedule by March 5, 2018, they will file whatever portions of the case schedule are agreed to,
17 highlight for the Court the unresolved issues, and will ask the Court for a further Case Management
18 Conference to resolve any remaining issues as soon as practicable;

19 WHEREAS, in the interim, the parties agree to tentatively abide by an infringement
20 schedule, as set forth in their correspondence, whereby Dr. Cohen will file his amended complaints
21 and serve infringement contentions on March 1, 2018, and Defendants will serve invalidity
22 contentions by May 1, 2018 (though, as indicated above, in the absence of further agreement
23 between the parties Defendants intend to request on March 5th a modified schedule that accelerates
24 consideration of Mr. Tzanavaras's inventorship claim).

25 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED THAT, the deadline
26 for the parties to provide a submission with a proposed scheduled and discovery plan shall, subject
27 to the Court's approval, be extended to March 5, 2018.

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IT IS SO STIPULATED.

Dated: February 26, 2018

Respectfully submitted,

By: /s/ Andrew S. Ong
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Attorneys for Applied Materials, Inc.

Dated: February 26, 2018

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1 Dated: February 26, 2018

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12 HUAWEI DEVICE (DONGGUAN) CO., LTD.,

13 HUAWEI DEVICE CO., LTD., AND

14 HISILICON TECHNOLOGIES CO., LTD.

15 Dated: February 26, 2018

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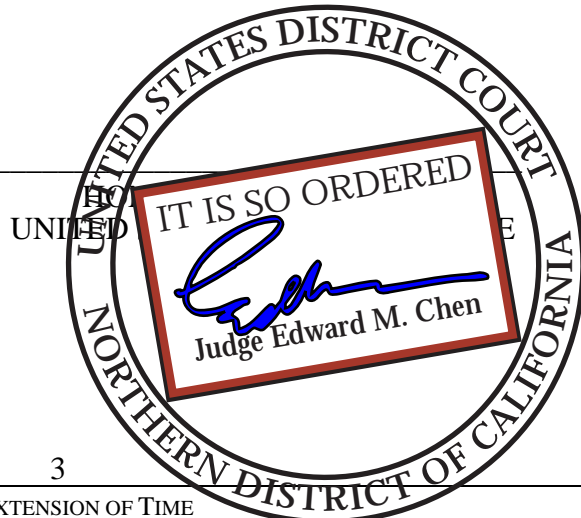
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25 jmmanning@steyerlaw.com

26 Attorneys for Dr. Uri Cohen

27 **IT IS SO ORDERED.**

28 Dated: February 27, 2018



ATTORNEY ATTESTATION

I hereby attest, pursuant to Local Rule 5-1(i)(3), that I obtained the concurrence in the filing of this document from the signatories indicated by the conformed signature (/s/).

/s/ Andrew S. Ong
Andrew S. Ong

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