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Attorneys for Power Density Solutions LLC

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

POWER DENSITY SOLUTIONS LLC, a  
Delaware limited liability company,

*Plaintiff,*

v.

IBM CORPORATION, a New York  
Corporation, and DOES 1-10, inclusive,

*Defendant*

Case No. 3:19-cv-03710-RS

STIPULATION AND ~~[PROPOSED]~~ ORDER  
EXTENDING CASE DEADLINES BASED  
ON NEW AMENDED COMPLAINT

Hon. Richard Seeborg

1 Pursuant to Civil Local Rules 6-1(b), 6-2(a), and 7-12, Plaintiff Power Density Solutions  
2 LLC (“PDS”) and Defendant IBM Corporation (“IBM”), through their respective attorneys,  
3 declare as follows:

4 WHEREAS, on June 26, 2019, Plaintiff Power Density Solutions LLC (“PDS”)   
5 commenced the instant action by filing a complaint (the “Original Complaint”) against Defendant  
6 IBM Corporation (“IBM”) in this Court;

7 WHEREAS, on October 10, 2019, the Court held an initial case management conference  
8 and the Court issued an Initial Case Management Scheduling Order setting case deadlines (Dkt.  
9 No. 30);

10 WHEREAS, on October 17, 2019 PDS filed an amended complaint (the “Amended  
11 Complaint”) adding an additional claim of patent infringement for an additional patent against  
12 IBM (Dkt. No. 31);

13 WHEREAS, the current Initial Case Management Scheduling Order was based on there  
14 being one patent in the case that was asserted on June 26, 2019;

15 WHEREAS, there have been three stipulated extensions to respond to the Original  
16 Complaint that did not require a court order and no extensions of time in this case requiring a  
17 court order.

18 NOW THEREFORE, pursuant to Civil Local Rules 6-1(b), 6-2(a), and 7-12, the parties  
19 hereto stipulate to extend all the ordered case deadlines as indicated in the table below:

<b>Event</b>	<b>Current Deadline</b>	<b>New Stipulated Deadline</b>
Response to Complaint	October 23, 2019	November 21, 2019
Opposition to Motion to Dismiss	November 27, 2019	January 24, 2020
Reply in Support of Motion to Dismiss	December 18, 2019	February 14, 2020
Hearing on Motion to Dismiss	January 9, 2020 at 1:30 p.m.	February 27, 2020 at 1:30 p.m.
Disclosure of Asserted Claims & Infringement Contentions (Pat. L.R. 3- 1 & 3-2)	January 13, 2020	February 18, 2020
Invalidity Contentions (Pat. L.R. 3- 3 & 3-4)	April 13, 2020	May 18, 2020
Exchange of Proposed Terms for Construction (Pat. L.R. 4-1)	April 27, 2020	June 1, 2020

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<b>Event</b>	<b>Current Deadline</b>	<b>New Stipulated Deadline</b>
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Pat. L.R. 4-2)	May 4, 2020	June 8, 2020
File Joint Claim Construction and Prehearing Statement (Pat. L.R. 4-3)	June 12, 2020	July 17, 2020
Completion of Claim Construction Discovery (Pat. L.R. 4-4)	July 13, 2020	August 17, 2020
PDS Opening Claim Construction Brief (Pat. L.R. 4-5(a))	August 3, 2020	September 7, 2020
IBM Opposition Claim Construction Brief (Pat. L.R. 4-5(b))	August 24, 2020	September 28, 2020
PDS Reply Claim Construction Brief (Pat. L.R. 4-5(c))	August 31, 2020	October 5, 2020
Claim Construction Hearing (Pat. L.R. 4-6)	September 14, 2020	October 19, 2020

1 DATED: October 30, 2019

Respectfully submitted,

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By /s/ Michael D. Powell

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17 DATED: October 30, 2019

Respectfully submitted,

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By /s/ Cody R. LeJeune

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**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: 11/4/19



RICHARD SEEBORG  
United States District Judge