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7 Attorneys for Plaintiff FRANK T. SHUM

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 10 UNITED STATES DISTRICT COURT  
 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 12 OAKLAND DIVISION

13 FRANK T. SHUM,  
 14 Plaintiff,  
 15 v.  
 16 INTEL CORPORATION, JEAN-MARC  
 VERDIELL, and LIGHTLOGIC, INC.,  
 17 Defendants.  
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Case No. C02-3262 DLJ (EMC)

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING BRIEFING  
 AND HEARING DEADLINES ON  
 PLAINTIFF FRANK T. SHUM'S  
 MOTION TO COMPEL  
 DEFENDANTS TO PRODUCE  
 DOCUMENTS**

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1 WHEREAS, on September 10, 2008 Defendant Intel Corporation ("Intel") produced a  
2 privilege log, and on September 18, 2008, Intel produced additional documents;

3 WHEREAS, based on Intel's privilege log and September 18, 2008 document production,  
4 Plaintiff Frank T. Shum ("Shum") filed a Motion to Compel Defendants to Produce Documents on  
5 September, 19, 2008;

6 WHEREAS, by this Court's September 9, 2008 Order, trial is set to begin on November 10,  
7 2008;

8 WHEREAS, counsel for Shum and counsel for Defendants agree that it is desirable to dispose  
9 of discovery issues as quickly as practicable;

10 WHEREAS, counsel for Shum and counsel for Defendants agree that: (1) the date for  
11 Defendants to serve their opposition to Shum's Motion to Compel shall be September 29, 2008; (2) the  
12 date for Shum to serve his reply in support of his Motion to Compel shall be October 3, 2008; and (3)  
13 the hearing on the Motion to Compel shall take place on October 8, 2008, or such other day as may be  
14 acceptable to the Court;

15 WHEREAS, the parties agree that Shum may supplement his trial exhibit list should additional  
16 documents be produced as a result of the hearing and order of the Court. Such supplementation is  
17 limited to newly-produced documents (if any) and must be completed within 3 days of Shum's receipt  
18 of such documents;

19 WHEREAS, allowing the shortening of the briefing and hearing deadlines on Shum's Motion  
20 to Compel as set forth immediately above will not affect any of the other pretrial dates, including the  
21 November 10, 2008 trial date set;

22 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among Shum and  
23 Defendants, by and through their respective counsel, that Defendants' opposition to Plaintiff Frank T.  
24 Shum's Motion to Compel Defendants to Produce Documents shall be filed on September 29, 2008,  
25 Shum's reply in support of said Motion shall be filed on October <sup>2</sup>~~3~~, 2008, and the hearing on the  
26 Motion shall be on October 8, 2008.

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DATED: September 22, 2008

TOWNSEND AND TOWNSEND AND CREW LLP

By: /s/ Tali L. Alban

TALI L. ALBAN

Attorneys for Plaintiff FRANK T. SHUM

DATED: September 22, 2008

TAYLOR & COMPANY LAW OFFICES, INC.

By: /s/ Jayesh Hines-Shah

JAYESH HINES-SHAH

Attorneys for Defendants INTEL CORPORATION,  
LIGHTLOGIC, INC. and JEAN-MARC VERDIELL

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: September 23, 2008 (modified)



HON. EDWARD M. CHEN  
MAGISTRATE JUDGE

**GENERAL ORDER ATTESTATION**

I, Tali L. Alban, am the ECF user whose ID and password are being used to file this  
**STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING AND HEARING  
DEADLINES ON PLAINTIFF FRANK T. SHUM'S MOTION TO COMPEL DEFENDANTS  
TO PRODUCE DOCUMENTS** In compliance with General Order 45, X.B., I hereby attest that  
Jayesh Hines-Shah has concurred in this filing.

/s/ Tali L. Alban  
TALI L. ALBAN

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