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5 *Attorneys for Defendants*

6  
 7 UNITED STATES DISTRICT COURT  
 8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 9 OAKLAND DIVISION

10 CYPRESS SEMICONDUCTOR CORPORATION,  
 11 a Delaware Corporation,

12 Plaintiff,

13 v.

14 DEUTSCHE BANK SECURITIES INC., a  
 Delaware Corporation, DEUTSCHE BANK ALEX.  
 15 BROWN, a Division of Deutsche Bank Securities  
 Inc., and DEUTSCHE BANK AG,

16 Defendants.  
 17

Case Number CV-11-617-CW

(Case Assigned to Hon. Claudia Wilken)

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING TIME FOR  
 DEFENDANTS TO RESPOND TO  
 COMPLAINT AND ADJOURNING  
 NOVEMBER 29, 2011 CASE  
 MANAGEMENT CONFERENCE**

18 Plaintiff and Defendants, by and through their respective undersigned counsel, stipulate and  
 19 agree as follows:

20 WHEREAS, on June 2, 2011, the Court So Ordered the parties' initial stipulation  
 21 extending the time for Defendants to respond to the Complaint in this action to July 11, 2011; and

22 WHEREAS, on July 8, 2011, the Court So Ordered the parties' second stipulation  
 23 extending the time for Defendants to respond to the Complaint in this action through and including  
 24 August 24, 2011; and

25 WHEREAS, on September 1, 2011, the Court So Ordered the parties' third stipulation  
 26 extending the time for Defendants to respond to the Complaint in this action through and including  
 27 September 23, 2011; and

28 STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS  
 TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT  
 CONFERENCE - CV-11-617-CW

1           WHEREAS, on September 29, 2011, the Court So Ordered the parties' fourth stipulation  
2 extending the time for Defendants to respond to the Complaint in this action through and including  
3 October 24, 2011; and

4           WHEREAS, on October 25, 2011, the Court So Ordered the parties' fifth stipulation  
5 extending the time for Defendants to respond to the Complaint in this action through and including  
6 November 23, 2011; and

7           WHEREAS the parties have now reached agreement on the terms of a settlement and  
8 anticipate filing a stipulation of dismissal within fourteen (14) days; and

9           WHEREAS, accordingly, Defendants have met and conferred with Plaintiff and requested  
10 an additional 30-day extension of the time for all Defendants to move against, answer or respond  
11 to the Complaint (through and including December 23, 2011), by which time the parties anticipate  
12 having filed a stipulation of dismissal; and

13           WHEREAS, Plaintiff has consented to Defendants' request; and

14           WHEREAS the Court had scheduled an initial Case Management Conference for  
15 November 29, 2011 at 2:00 p.m.; and

16           WHEREAS the parties believe that there will be no need for a Case Management  
17 Conference because a stipulation of dismissal will be filed within fourteen (14) days;

18           IT IS HEREBY STIPULATED, by and between Plaintiff and Defendants, through their  
19 respective counsel, and subject to Court approval, that the time for all Defendants to move against,  
20 answer or respond to the Complaint shall be extended from November 23, 2011 through and  
21 including December 23, 2011; and

22           IT IS FURTHER STIPULATED that the Case Management Conference scheduled for  
23 November 29, 2011 at 2:00 p.m. shall be adjourned.

24           In accordance with General Order 45 of the United States District Court for the Northern  
25 District of California, I attest that concurrence in the filing of this document has been obtained  
26 from the undersigned counsel.

1 DATED: November 22, 2011

Respectfully submitted,

2 By /s/ Philip J. Wang  
3 Philip J. Wang (SBN 218349)  
4 Justin S. Chang (SBN 205925)  
5 WANG & CHANG, A PROFESSIONAL  
6 LAW CORPORATION  
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*Attorneys for Plaintiff*

13 By /s/ William J. Goines  
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- and -

21 Stephen L. Saxl (*Not admitted in N.D. Cal.*)  
22 Toby S. Soli (*Not admitted in N.D. Cal.*)  
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24 200 Park Avenue  
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*Attorneys for Defendants*

**PROPOSED ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED. A case management conference will be held on Wednesday, January 18, 2012, at 2:00 p.m.**

DATED: \_\_\_\_\_ November 28, 2011

  
The Honorable Claudia Wilken  
United States District Judge

STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME FOR DEFENDANTS  
TO RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE MANAGEMENT  
CONFERENCE - CV-11-617-CW

1 ATTESTATION CLAUSE

2 I, William J. Goines, am the ECF User whose ID and password are being used to file this  
3 STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANTS TO  
4 RESPOND TO COMPLAINT AND ADJOURNING NOVEMBER 29, 2011 CASE  
5 MANAGEMENT CONFERENCE. In compliance with General Order 45, X.B., I hereby attest  
6 that Philip J. Wang has concurred in this filing.

7  
8 Date: November 23, 2011

GREENBERG TRAUIG, LLP

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10 By: /s/ William J. Goines

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STIPULATION AND [~~PROPOSED~~] ORDER EXTENDING TIME FOR DEFENDANTS  
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