

Keith L. Slenkovich (SBN 129793)
Keith.Slenkovich@wilmerhale.com
Joseph F. Haag (SBN 248749)
Joseph.Haag@wilmerhale.com
Nathan L. Walker (SBN 206128)
Nathan.Walker@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

William F. Lee (*pro hac vice*)
William.Lee@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

James M. Dowd (SBN 259578)
James.Dowd@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
350 S. Grand Avenue, Suite 2100
Los Angeles, CA 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400

Attorneys for Plaintiff MEDIATEK INC.

Alexander Hadjis (*pro hac vice*)
Alexander.Hadjis@cwt.com
CADWALADER, WICKERSHAM & TAFT
LLP
700 Sixth Street, NW
Washington, DC 20001
Telephone: (202) 862-2323
Facsimile: (202) 862-2400

Rudy Y. Kim (CA SBN 199426)
RudyKim@mofo.com
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 813-5600
Facsimile: (650) 494-0792

Joshua A. Hartman (*pro hac vice*)
JHartman@mofo.com
MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue NW
Suite 6000
Washington, DC 20006
Telephone: (202) 887-1500
Facsimile: (202) 887-0763

Attorneys for Defendant
FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MEDIATEK INC.

Plaintiff,

v.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

**Civil Action No. 4:11-cv-05341 (YGR)
(JSC)
ORDER CONFIRMING
JOINT STATEMENT OF PRETRIAL
TASKS**

Hon. Yvonne Gonzalez Rogers

1 Pursuant to paragraph 9 of the Court's Pretrial Order No. 1 (Dkt. No. 433), MediaTek
2 Inc. ("MediaTek") and Freescale Semiconductor, Inc. ("Freescale") hereby submit this Joint
3 Statement of Pretrial Tasks. At the pretrial conference on February 7, 2014, the Court outlined
4 various tasks for the parties to address in the coming weeks. This submission identifies those
5 tasks.

6 The parties shall jointly file the following items by noon (12:00 p.m.) on February 24,
7 2014:

- 8 1. Statement of Additional Undisputed Factual Stipulations;
- 9 2. Statement of Procedural Stipulations, Pursuant to Exhibit A to the Court's Pretrial
10 Order;
- 11 3. Summary of Experts' Opinions Disclosed in Their Expert Reports;
- 12 4. Revised Exhibit List;
- 13 5. Revised Jury Instructions;
- 14 6. Remaining Discovery Designation Disputes, Including Video Designations; and
- 15 7. Revised List of Potential Trial Witnesses (Dkt. No. 433 ¶ 8).

16 The parties further jointly commit to meet and confer in good faith on the following
17 topics, in an attempt to reach a mutually satisfactory resolution:

- 18 1. **Joint Stipulations:** The parties will meet and confer on a list of additional Joint
19 Stipulations, as well as on whether a list of Joint Stipulations should be read to the
20 jury and whether the parties will agree to providing a list of Joint Stipulations to
21 the jury.
 - 22 2. **Admissibility of Exhibits:** The parties will meet and confer regarding the
23 admissibility of exhibits on the parties' revised exhibit list.
 - 24 3. **Reference Manuals:** The parties will meet and confer to determine a manageable
25 approach for admission of Freescale product reference manuals as exhibits.
 - 26 4. **Translator:** The parties will meet and confer to agree on one joint translator for
27 any witnesses who require a translator in court.
- 28

5. **Verdict Form:** The parties will meet and confer to develop a joint verdict form based on MediaTek's proposed verdict form.
6. **Order of Case:** The parties will meet and confer to determine an agreed-upon sequence regarding the parties' respective presentations of their cases-in-chief, rebuttals, and potential sur-rebuttals.
7. **The '244 Patent:** The parties will meet and confer about a stipulation for dismissal of the '244 patent.
8. **Exchange of Opening Statement Graphics:** The parties will meet and confer to determine a schedule for exchanging any visuals, graphics, or exhibits to be used during opening statements, with the exchange taking place no later than March 10, 2014 unless otherwise agreed by the parties. The parties will further meet and confer in attempt to resolve any disagreement concerning opening statements and understand that any unresolved objections to opening statements must be made in a writing not to exceed three pages by March 14, 2014.
9. **Exchange of demonstratives:** The parties will meet and confer about demonstratives, including the timing of exchange of demonstratives and any objections to demonstratives.

Dated: February 12, 2014

Respectfully submitted,

WILMER CUTLER PICKERING
HALE AND DORR LLP

By: /s/ Keith L. Slenkovich
Keith L. Slenkovich

Keith L. Slenkovich (SBN 129793)
Keith.Slenkovich@wilmerhale.com
Joseph F. Haag (SBN 248749)
Joseph.Haag@wilmerhale.com
Christopher A. Franklin (SBN 272587)
Christopher.Franklin@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP

950 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

William F. Lee (*pro hac vice*)
William.Lee@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
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WILMER CUTLER PICKERING
HALE AND DORR LLP
350 S. Grand Avenue, Suite 2100
Los Angeles, CA 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400

Attorneys for Plaintiff MEDIATEK INC.

Dated: February 12, 2014

Respectfully submitted,

FREESCALE SEMICONDUCTOR, INC.

By its attorneys,

/s/ Alexander J. Hadjis
Alexander J. Hadjis (*pro hac vice*)
Alexander.Hadjis@cwt.com
CADWALADER, WICKERSHAM & TAFT
LLP
700 Sixth Street, N.W.
Washington, D.C. 20001
Telephone: (202) 862-2323
Facsimile: (202) 862-2400

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Palo Alto, California 94304
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MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, NW
Suite 6000
Washington, DC 20006
Telephone: (202) 887-1500
Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant
FREESCALE SEMICONDUCTOR, INC.

IT IS SO ORDERED.
Dated: February 18, 2014


YVONNE GONZALEZ ROGERS
U.S. DISTRICT COURT JUDGE