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11 Attorneys for Defendants and Counterclaim Plaintiffs
 LG ELECTRONICS, INC.,
 12 LG ELECTRONICS U.S.A., INC., and
 LG ELECTRONICS MOBILECOMM U.S.A., INC.
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14 **UNITED STATES DISTRICT COURT**
 15 **NORTHERN DISTRICT OF CALIFORNIA**
 16 **OAKLAND DIVISION**

18 CYPRESS SEMICONDUCTOR)
 CORPORATION,)
 19)
 Plaintiff and)
 20 Counterclaim Defendant,)
)
 21 vs.)
)
 22 LG ELECTRONICS, INC.,)
 LG ELECTRONICS U.S.A., INC., and)
 23 LG ELECTRONICS MOBILECOMM)
 U.S.A., INC.,)
 24)
 Defendants and)
 25 Counterclaim Plaintiffs.)
 26)
 27)
 28)

CASE NO. 4:13-CV-04034-SBA

**STIPULATION AND ~~PROPOSED~~
 ORDER SHORTENING TIME ON
 DEFENDANTS' MOTION TO STAY
 PROCEEDINGS**

[Civil L.R. 6-1(b) and 6-2]

1 **STIPULATION**

2 Pursuant to Civil Local Rules 6-1(b) and 6-2, Defendants, LG Electronics, Inc., LG
3 Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc. (collectively
4 “Defendants”) and Plaintiff Cypress Semiconductor Corporation (“Plaintiff”) (collectively “the
5 Parties”) hereby stipulate as follows:

6 WHEREAS claim construction proceedings in this patent infringement case are
7 scheduled to commence on March 24, 2014 [Dkt. 50];

8 WHEREAS on January 24, 2014 Plaintiff served its Patent Local Rule 3-1 and 3-2
9 disclosures (“Plaintiff’s Disclosures”);

10 WHEREAS the Parties dispute the adequacy of Plaintiff’s Disclosures after having met
11 and conferred on the subject;

12 WHEREAS on March 7, 2014, Defendants filed a Motion to Strike Plaintiff’s
13 Disclosures and requested a hearing on or after April 15, 2014 [Dkt. 58];

14 WHEREAS on March 7, 2014, Plaintiff served supplemental Patent Local Rule 3
15 disclosures (“Plaintiff’s Supplemental Disclosures”);

16 WHEREAS on March 10, 2014, Defendants filed a Motion to Strike Plaintiff’s
17 Supplemental Disclosures and for a Stay of Proceedings and requested a hearing on or after April
18 15, 2014 [Dkt. 62];

19 WHEREAS the Parties disagree whether it is necessary to stay proceedings pending the
20 Court’s ruling on Defendants’ pending Motions to Strike, but the Parties agree it is critical that
21 the Court decide whether to stay proceedings before claim construction proceedings begin on
22 March 24, 2014; and

23 WHEREAS the Parties have accordingly agreed to present this stipulation and proposed
24 order to the Court for an order shortening time on the briefing of Defendants’ Motion to Stay
25 Proceedings pursuant to Civil Local Rules 6-1(b) and 6-2;

26 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG THE
27 PARTIES THAT:

1 Plaintiff will file its Opposition to Defendants' Motion to Stay Proceedings on or before
2 March 13, 2014; and

3 Defendants will file their Reply in further support of their Motion to Stay Proceedings on
4 or before March 14, 2014.

5 **IT IS SO STIPULATED.**

6 Dated: March 11, 2014

KAYE SCHOLER, LLP

7 By: /s/ Michael J. Malecek
8 Michael J. Malecek

9 Attorneys for Plaintiff & Counterclaim Defendant
10 CYPRESS SEMICONDUCTOR
11 CORPORATION

12 Dated: March 11, 2014

THE LAW OFFICE OF PHILIP A. LEIDER
13 ROTHWELL, FIGG, ERNST & MANBECK, P.C.

14 By: /s/ Jenny L. Colgate
15 Jenny L. Colgate

16 Attorneys for Defendants & Counterclaim Plaintiffs
17 LG ELECTRONICS, INC., LG ELECTRONICS
18 U.S.A., INC., and LG ELECTRONICS
19 MOBILECOMM U.S.A., INC.
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PROPOSED ORDER

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2 Having considered the foregoing stipulation of the Parties, and finding good cause to
3 shorten time on Defendants' Motion to Stay Proceedings, the Court hereby ORDERS as follows:

4 Plaintiff will file its Opposition to Defendants' Motion to Stay Proceedings on or before
5 March 13, 2014;

6 Defendants will file its Reply in further support of Defendants' Motion to Stay
7 Proceedings on or before March 14, 2014.

8 **IT IS SO ORDERED.**

9 Dated: 3/11/2014



10 HON. SAUNDRA BROWN ARMSTRONG
11 U.S. DISTRICT JUDGE
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