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21 TECHNOLOGY LICENSING CORP.

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 OAKLAND DIVISION

25 **TECHNOLOGY LICENSING CORP.,**
26
27 **Plaintiff,**
28
29 **v.**
30
31 **BLACKMAGIC DESIGN PTY LTD.,**
32
33 **Defendant.**

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Laurie M. Charrington (State Bar No. 229679)
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Attorneys for Defendant
BLACKMAGIC DESIGN PTY LTD.

Case No. 4:13-CV-05184 SBA
STIPULATION TO EXTEND
PATENT LOCAL RULE DEADLINES
BY THIRTY (30) DAYS

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STIPULATION TO EXTEND PATENT LOCAL
RULE DEADLINES BY 30 DAYS
CASE NO. 4:13-CV-05184-SBA

1 Pursuant to Civil Local Rules 6-1(a) and 7-12, Plaintiff Technology Licensing
2 Corporation (“TLC”) and Defendant Blackmagic Design PTY LTD. (“Blackmagic”) (collectively
3 “the parties”) hereby stipulate to extend Blackmagic’s deadlines under Patent Local Rule 3-3 and
4 3-4 by 30 days.

5 WHEREAS TLC served its Patent Local Rule 3-1 infringement contentions on March 6,
6 2014. Pursuant to Patent Local Rule 3-3 and 3-4, and the Joint Proposed Case Management
7 Order (ECF No. 59), Blackmagic’s invalidity contentions are currently due April 21, 2014.

8 WHEREAS Blackmagic proposed the parties agree to limit the number of asserted claims
9 in this case and the number of prior art references, however TLC has not yet agreed to limit the
10 number of claims. Blackmagic intends to move for an Order directing TLC to limit the number
11 of claims it asserts against Blackmagic, before Blackmagic is required to serve its invalidity
12 contentions under the Patent Local Rules.

13 WHEREAS the parties have agreed to extend the deadline for Blackmagic to serve its
14 invalidity contentions so Blackmagic may seek an Order before its contentions are due.

15 WHEREAS no schedule has been set in this case. Therefore, the schedule previously
16 proposed by the parties (ECF No. 59) should be modified as set forth in Exhibit A.

17 **BLACKMAGIC AND TLC HEREBY STIPULATE THAT:**

18 Blackmagic’s deadlines under Patent L.R. 3-3 and 3-4 shall be extended 30 days, and
19 Blackmagic’s Invalidity Contentions are now due May 21. The parties further stipulate that the
20 schedule previously submitted by the parties (ECF No. 59) is withdrawn and the Amended Joint
21 Proposed Case Schedule attached as Exhibit A shall be submitted to the Court for consideration.

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Dated: April 7, 2014

Respectfully submitted,

JONES DAY

By: /s/ Laurie M. Charrington
Laurie M. Charrington

Attorneys for Defendant
BLACKMAGIC DESIGN PTY LTD.

NIRO, HALLER & NIRO

By: /s/ Joseph N. Hosteny
Joseph N. Hosteny

Attorneys for Plaintiff
TECHNOLOGY LICENSING
CORPORATION

IT IS SO ORDERED:
Dated: 4/15/2014


Saundra Brown Armstrong
U.S. District Judge

Exhibit A
Amended Joint Proposed Case Schedule

Previously Proposed Dates (ECF No. 59)	Amended Proposed Deadlines	Event
April 21, 2014	May 21, 2014	Serve "Invalidity Contentions." (PLR 3-3). Produce documents to accompany "Invalidity Contentions." (PLR 3-4).
May 5, 2014	June 9, 2014	Exchange of Proposed Terms for Construction. (PLR 4-1).
May 26, 2014	June 30, 2014	Exchange of Preliminary Claim Construction and Extrinsic Evidence. (PLR 4-2).
June 20, 2014	July 21, 2014	File Joint Claim Construction and Prehearing Statement. (PLR 4-3).
July 21, 2014	August 20, 2014	Complete Claim Construction discovery. (PLR-4-4).
August 4, 2014	September 4, 2014	Opening claim construction brief due. (PLR 4-5).
August 18, 2014	September 22, 2014	Responsive claim construction brief due. (PLR 4-5).
August 25, 2014	October 2, 2014	Reply claim construction brief due. (PLR 4-5).
October 17, 2014	October 17, 2014	2 Binders of each sides presentation slides for Claim construction hearing due.
October 23, 2014, 10:00 a.m.	October 23, 2014, 10:00 a.m.	Claim construction hearing. (PLR 4-6).
50 days after the Court's service of the claim construction ruling	50 days after the Court's service of the claim construction ruling	Advice of counsel defense discovery due. (PLR 3-7).
TBD	TBD	Close of fact discovery.
TBD	TBD	Designation of expert witnesses and exchange of initial reports for party with burden of proof.
TBD	TBD	Exchange of rebuttal expert reports.
TBD	TBD	Close of expert discovery.
TBD	TBD	Dispositive motions and motions re experts due.
TBD	TBD	Pretrial conference.

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ATTESTATION

I, Laurie M. Charrington, an ECF User whose ID and password are being used to file this
STIPULATION TO EXTEND PATENT LOCAL RULE DEADLINES BY THIRTY (30)
DAYS, in compliance with Civil L.R. 5-1(i)(3), hereby attest that Joseph N. Hosteny, attorney for
Technology Licensing Corp., has concurred with this filing.

Dated: April 7, 2014

By: /s/ Laurie M. Charrington
Laurie M. Charrington

Attorneys for Defendant
BLACKMAGIC DESIGN PTY LTD.

SVI-143666v1