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12
 13 UNITED STATES DISTRICT COURT
 14 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 15

16 DAVID R. SISKIN,
 17 Plaintiff,
 18 v.
 19 SURELL ACCESSORIES, INC.
 20 Defendant.

Case No.: CASE NO. 4:15-cv-00139-JSW

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO CONTINUE ALL DEADLINES PENDING
 SETTLEMENT AGREEMENT**

21 Pursuant to Civil L.R. 6-2, Plaintiff David R. Siskin ("Plaintiff") and Defendant Surell
 22 Accessories, Inc. ("Defendant") hereby jointly request that the Court extend all pending deadlines
 23 by 45 days to allow the parties to complete a formal settlement agreement. The parties reached
 24 settlement terms on April 29, 2015.

25 Pursuant to Civil L.R. 6-2(a)(1), the parties state the following:

- 26 1. The parties have been discussing settlement.
 27

1 2. The parties reached agreement on settlement terms and have begun drafting a formal
 2 settlement agreement, and they anticipate filing a notice of voluntary dismissal on or before May
 3 29, 2015.

4 3. Accordingly, the parties jointly and respectfully request that the Court extend the pending
 5 deadlines as follows to provide sufficient time to finalize a settlement agreement and meet the
 6 terms thereof:

Event	Presently Scheduled Date	Proposed Date
Last day for Plaintiff to file Answer or otherwise respond to Counterclaims	Apr. 30, 2015	June 15, 2015
Last day for Plaintiff to serve Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production	May 1, 2015	June 15, 2015
Last day for Defendant to serve Invalidity Contentions and Accompanying Document Production	June 15, 2015	July 30, 2015
Last day for Parties to exchange proposed claim terms for construction	June 29, 2015	Aug. 13, 2015
ADR: Court mediation to be completed	July 16, 2015	Aug. 31, 2015
Parties to exchange preliminary claim construction and extrinsic evidence	July 20, 2015	Sept. 3, 2015
Deadline for either party to request leave to designate more than ten terms for claim construction	July 31, 2015	Sept. 14, 2015
Last day for Parties to file and serve joint claim construction and prehearing statement	Aug. 14, 2015	Sept. 28, 2015
Claim Construction discovery cutoff	Sept. 14, 2015	Oct. 29, 2015
Last day for Plaintiff to file opening claim construction brief	Oct. 13, 2015	Nov. 27, 2015
Last day for Defendant to file responsive claim construction brief	Oct. 27, 2015	Dec. 11, 2015
Last day for Plaintiff to file reply claim construction brief; last day for parties to file an amended, final joint claim construction statement	Nov. 3, 2015	Dec. 18, 2015

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2 4. Pursuant to Civil L.R. 6-2(a)(2), the parties previous requested three extensions of time for
3 Defendant to respond to and answer the Complaint. (Dkt. Nos. 12, 13, 18).

4 5. Pursuant to Civil L.R. 6-2(a)(3), the requested time modification would delay the current
5 case management schedule by 45 calendar days.
6 The tutorial set for December 3, 2015 and claim construction hearing set for December 10, 2015 are
7 VACATED and shall be reset by further order, if necessary.

8 Dated: April 29, 2015

AXCEL LAW PARTNERS LLP

9 By: /s/ Marcel F. De Armas
Marcel F. De Armas

10 Attorney for Plaintiff DAVID R. SISKIN

11
12 Dated: April 29, 2015

WILD, CAREY & FIFE

13
14 By: /s/ Enoch Wang
Enoch Wang

15
16 Attorney for Defendant
Surrell Accessories, Inc.

17
18 **PROPOSED ORDER**

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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21
22 Date: April 30, 2015


U.S. District Judge Jeffrey S. White

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