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Counsel for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

Counsel for Apple Inc.

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

APPLE INC.

Plaintiff,

v.

IXI MOBILE (R&D) LTD., et al.,

Defendants.

SAMSUNG ELECTRONICS CO., LTD., et al.

Plaintiffs,

v.

IXI MOBILE (R&D) LTD., et al.,

Defendants.

Case No. 4-19-cv-06769-HSG

**JOINT STIPULATION AND
ORDER TO EXTEND THE
DEADLINE FOR SUBMITTING A
JOINT CLAIM CONSTRUCTION
STATEMENT UNDER PATENT L.R.
4-3**

Case No. 4-19-cv-06773-HSG

1 Plaintiffs Apple Inc. (“Apple”), Samsung Electronics Co., Ltd. and Samsung Electronics
2 America, Inc. (“Samsung”), and IXI Mobile (R&D) Ltd. and IXI IP LLC (“IXI) (collectively
3 “Parties”) respectfully file this Joint Stipulation and Proposed Order to Extend the Deadline for
4 Submitting a Joint Claim Construction Statement Under Patent L.R. 4-3.

5 These cases were filed on October 18, 2019 by Apple and Samsung, seeking a declaratory
6 judgment regarding U.S. Patent No. 7,039,033.

7 On June 17, 2020, Apple and Samsung filed *Apple Inc. v. IXI Mobile (R&D) Ltd., et al.*, No.
8 5:20-cv-04050-HSG and *Samsung Elecs. Co., et al. v. IXI Mobile (R&D) Ltd., et al.*, No. 5:20-cv-
9 04047-HSG, seeking a declaratory judgment regarding U.S. Patent No. 7,295,532.

10 The Parties expect to move for consolidation of the pending cases regarding the ’033 and ’532
11 patents, and are currently working on a proposed schedule for such consolidated actions. As part of
12 that proposed schedule, the Parties expect to propose a new date for a single Joint Claim Construction
13 Statement that includes both the ’033 and ’532 patents.

14 To allow time for the Parties to attempt to reach agreement on a proposed consolidated
15 schedule, and to avoid unnecessary filing of a Joint Claim Construction Statement for the ’033 patent
16 alone, the Parties propose extending the deadline from August 6, 2020 to August 13, 2020—with the
17 expectation that this proposed date will subsequently be mooted by a proposed date submitted in
18 conjunction with proposed consolidation.

19 The Parties previously stipulated to an extension of time for IXI to respond to Apple’s and
20 Samsung’s Motion to Stay, which was granted by the Court. The Parties do not expect that this
21 proposed extension will have an impact on other dates in the case.

22 Accordingly, the Parties respectfully submit this Joint Stipulation to extend the deadline for
23 filing a Joint Claim Construction Statement under Patent L.R. 4-3 from August 6, 2020 to August 13,
24 2020.

25 IT IS SO STIPULATED.
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1 Dated: August 4, 2020

/s/ Ameet A. Modi

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IP, LLC*

ECF ATTESTATION

1
2 I, Todd M. Friedman, am the ECF User whose ID and password are being used to file this Joint
3 Stipulation and Proposed Order to Extend the Deadline for Submitting a Joint Claim Construction
4 Statement Under Patent L.R. 4-3. In compliance with General Order 45, X.B., I hereby attest that
5 Ameet A. Modi and Hamad M. Hamad have concurred in this filing.

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7 /s/ Todd M. Friedman
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

The deadline for the parties to file a Joint Claim Construction Statement Under Patent L.R. 4-3 is extended from August 6, 2020 to August 13, 2020.

Dated: 8/5/2020


THE HONORABLE HAYWOOD S. GILLIAM, JR.