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14 **IN THE UNITED STATES DISTRICT COURT**  
 15 **NORTHERN DISTRICT OF CALIFORNIA**  
 16 **OAKLAND DIVISION**

17 APPLE INC.,  
 Plaintiff,

18 v.

19 IXI MOBILE (R&D) LTD. and IXI IP, LLC.,  
 20 Defendants.

21 SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.,

22 Plaintiffs,

23 v.

24 IXI MOBILE (R&D) LTD. And IXI IP, LLC.,  
 25 Defendants.  
 26

Case No. 4:19-cv-06769-HSG (Lead Case)  
 Case No. 4:20-cv-04050-HSG

**STIPULATION AND ORDER TO EXTEND  
 TIME TO RESPOND TO APPLE AND  
 SAMSUNG’S MOTION TO STAY  
 PENDING REEXAMINATION**

Case No. 4:19-cv-06773-HSG (Lead Case)  
 Case No. 4:20-cv-04047-HSG

Judge: Hon. Haywood S. Gilliam, Jr.

1 Pursuant to the Court’s Standing Order in Civil Cases and Civil L.R. 7-12, Defendants IXI  
2 Mobile (R&D) Ltd. and IXI IP, LLC. (“IXI”), and Plaintiffs Apple Inc. (“Apple”), Samsung Electronics  
3 Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”), through their respective attorneys, hereby  
4 stipulate as follows:

5 Apple and Samsung filed their Motion to Stay Pending Reexamination (the “Motion to Stay”) on  
6 October 23, 2020. Dkt. No. 93. IXI’s deadline to respond to the Motion to Stay is currently set for  
7 Friday, November 6, 2020, and Apple and Samsung’s deadline to reply is set for Friday, November 13,  
8 2020. IXI’s trial counsel, including lead counsel, was in trial for *VirnetX, Inc. v. Apple*, Civil Action No.  
9 6:12-CV-855-RWS. Apple and Samsung are set to serve invalidity contentions on November 24, 2020,  
10 and November 26, 2020 is the Thanksgiving holiday. The parties have met and conferred and have  
11 agreed to a 10-day extension of time for Defendants to respond to Apple and Samsung’s Motion to Stay  
12 Pending Reexamination and a reciprocal 7-day extension of time for Apple and Samsung to reply. As a  
13 result, Apple and Samsung’s deadline to reply to IXI’s Response to Apple’s and Samsung’s Motion to  
14 Stay Pending Reexamination is November 30, 2020. This extension will not affect any other deadlines in  
15 the Court’s schedule, or the hearing requested by Apple and Samsung on January 28, 2021. The Parties  
16 previously stipulated on August 24, 2020 a four-day extension in time for IXI to respond to and  
17 Samsung’s Complaints for Declaratory Judgment of Noninfringement and Invalidity. The extension  
18 allowed for IXI Mobile (R&D) Ltd. to file its answer on the same day as IXI IP, LLC. This previous  
19 stipulation did not modify any other dates or deadlines in this case.

20 NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED THAT the deadline to  
21 respond to Apple and Samsung’s Motion to Stay Pending Reexamination is November 16, 2020, and  
22 Apple and Samsung’s deadline for reply is November 30, 2020.

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24 Dated: November 3, 2020

Respectfully submitted,

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26 CALDWELL CASSADY CURRY PC.  
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By: /s/ Jason D. Cassady  
Jason D. Cassady  
Attorneys for Defendants  
IXI MOBILE (R&D) LTD. and IXI IP, LLC

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KIRKLAND ELLIS

By: /s/ Todd M. Friedman  
Todd M. Friedman  
Attorneys for Plaintiffs  
SAMSUNG ELECTRONICS CO., LTD., and  
SAMSUNG ELECTRONICS AMERICA, INC.

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5.1(i)(3), the undersigned attests that all parties have  
concurred in the filing of this Stipulation and [Proposed] Order.


Dated: November 3, 2020

CALDWELL CASSADY CURRY PC

/s/ Jason D. Cassady  
Jason D. Cassady

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2 DATE:11/6/2020

  
Hon. Haywood S. Gilliam, Jr.  
United States District Judge

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