

1 *Parties Listed On Signature Page*

2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

E-FILED - 10/15/08

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,
Plaintiff,
vs.
HYNIX SEMICONDUCTOR INC., et al.,
Defendant.

CASE NO.: C 05-00334 RMW
**STIPULATION AND [XXXXXXXXXXXXXXXXXXXX]
ORDER TO CHANGE TIME FOR
EXPERT DISCOVERY, DAUBERT
MOTIONS, AND DISPOSITIVE MOTIONS
[L.R. 6-2]**
Judge: Hon. Ronald M. Whyte
Courtroom: 6

RAMBUS INC.,
Plaintiff,
vs.
SAMSUNG ELECTRONICS CO., LTD.,
et al.,
Defendant.

CASE NO.: C 05-02298 RMW

RAMBUS INC.,
Plaintiff,
vs.
MICRON TECHNOLOGY INC., et al,
Defendants.

CASE NO. C-06-00244 RMW

1 WHEREAS, the expert discovery cutoff was set for October 10, 2008 by Order
2 dated July 16, 2008;

3 WHEREAS, the Court's Order of July 16, 2008 provides that *Daubert* and
4 dispositive motions must be filed by October 17, 2008, with oppositions due by October 31,
5 2008, and replies due by November 7, 2008, and motions to be heard on November 21, 2008;

6 WHEREAS, due to the scheduling constraints of the numerous expert witnesses,
7 and the need to schedule the depositions around the Jewish holidays taking place on September
8 30-October 1 and October 8-9, the parties are unable to schedule the expert depositions so that
9 they conclude by October 10, 2008;

10 WHEREAS; the parties have agreed, subject to the Court's approval, to extend the
11 deadline for completing expert discovery by one week, to October 17, and adjust the briefing and
12 hearing schedule for *Daubert* motions and dispositive motions to accommodate the expert
13 discovery extension;

14 WHEREAS, the parties agree that this extension will not impact the January 19,
15 2009 trial date;

16 WHEREAS, the parties have agreed to the briefing and hearing schedule set forth
17 below, subject to the Court's approval and availability:

18 NOW, THEREFORE, IT IS ORDERED THAT

19 The cutoff for expert discovery shall be extended to October 17, 2008 to
20 accommodate the agreement of counsel regarding scheduling of expert depositions;

21 Opening briefs for *Daubert* motions and dispositive motions shall be filed on or
22 before October 24, 2008;

23 Oppositions to *Daubert* and dispositive motions shall be filed on or before
24 November 7, 2008;

25 Replies to *Daubert* and dispositive motions shall be filed on or before November
26 14, 2008;

27 The hearing on *Daubert* and dispositive motions shall be on December 2, 2008.

28 SO ORDERED

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED:

10/15/08

Ronald M. Whyte

The Honorable Ronald M. Whyte
District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: October 2, 2008

MUNGER, TOLLES & OLSON LLP
SIDLEY AUSTIN LLP
McKOOL SMITH P.C.

By: /s/ Jennifer L. Polse
JENNIFER L. POLSE

Attorneys for RAMBUS INC.

DATED: October 2, 2008

JULIE HAN
TOWNSEND and TOWNSEND and CREW,
LLP

By /s/ Julie Han
JULIE HAN

Attorneys for HYNIX SEMICONDUCTOR
INC., HYNIX SEMICONDUCTOR
AMERICA INC., HYNIX
SEMICONDUCTOR MANUFACTURING
AMERICA INC., HYNIX
SEMICONDUCTOR U.K. LTD., and HYNIX
SEMICONDUCTOR DEUTSCHLAND
GmbH

DATED: October 2, 2008

SVEN RAZ
WEIL, GOTSHAL & MANGES LLP

By: /s/ Sven Raz
SVEN RAZ

Attorneys for MICRON TECHNOLOGY
INC., et. al.

DATED: October 2, 2008

ROBERT BEREZIN
WEIL, GOTSHAL & MANGES LLP

By: /s/ Robert Berezin
ROBERT BEREZIN

Attorneys for SAMSUNG ELECTRONICS
CO., LTD., SAMSUNG ELECTRONICS
AMERICA, INC., SAMSUNG
SEMICONDUCTOR, INC., AND SAMSUNG
AUSTIN SEMICONDUCTOR, L.P.

