

(Counsel listed in signature blocks)

E-FILED 1/22/09

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

MOSAID TECHNOLOGIES
INCORPORATED,

Defendant.

Case No. 5:06-CV-04496-JF

**JOINT STIPULATION BETWEEN
MICRON TECHNOLOGY, INC. AND
MOSAID TECHNOLOGIES INC.
REGARDING DEPOSITIONS
AND ORDER**

Micron Technology, Inc. ("Micron") and MOSAID Technologies Inc. ("MOSAID") hereby stipulate to withdrawal of their respective Motion for a Protective Order (Dkt. No. 188) and Motion to Compel Production of Micron Witnesses for Deposition (Dkt. No. 197) based upon the following representations and stipulations of Micron and MOSAID:

1. Micron will provide designees for MOSAID's outstanding 30(b)(6) notices, subject to Micron's objections. The time for these depositions will not exceed what is listed in the table on page 2 of "MOSAID Technologies Inc.'s Supplemental Opposition to Micron Technology, Inc.'s Motion For A Protective Order", Dkt. No. 215. Micron also objected to some topics based on relevancy and MOSAID and Micron will work to resolve these issues in good faith in hopes of avoiding further motion practice. MOSAID reserves the

1 right to seek additional time for these Notices, if the designees are not sufficiently
2 prepared for Micron to have met its 30(b)(6) obligations or for other good cause shown.
3 MOSAID's 11th Notice will be limited to topics 7-10.

- 4 2. Micron will provide a half day deposition for each of Steve Casper and Jared Adams.
5 The depositions of Michael Sadler, John Schreck, and Todd Merritt will be provided at a
6 later time, only if it is determined that they will be trial witnesses. The individual
7 depositions of John Wilford and Roger Norwood will proceed on the same day that they
8 are provided as 30(b)(6) designees. With the exception of these provisions, MOSAID's
9 served individual notices will be withdrawn. MOSAID reserves the right to seek to re-
10 notice these individuals for good cause shown.
- 11 3. The parties agree that an additional 30(b)(6) Notice for each party relating to
12 authentication and hearsay issues will occur during fact discovery, subject to good faith
13 objections regarding aspects of the specific topics.
- 14 4. The parties will work in good faith to deal with any outstanding issues relating to
15 Micron's objections to MOSAID's 30(b)(6) topics.

16 Accordingly, Micron and MOSAID respectfully request that the Court grant this Joint Stipulation
17 and withdraw Dkt. Nos. 188 and 197 and their associated briefing.
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1 Dated: January 21, 2009

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1 Dated: January 21, 2009

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 Dated: January 22, 2009



Magistrate Judge Richard Seeborg
United States District Court
Northern District of California

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