

1 John V. Picone III (State Bar No. 187226)
 jpicone@hopkinscarley.com
 2 Erik P. Khoobyarian (State Bar No. 226749)
 ekhoobyarian@hopkinscarley.com
 3 HOPKINS & CARLEY
 A Law Corporation
 4 The Letitia Building
 70 South First Street
 5 San Jose, CA 95113-2406

6 Attorneys for Plaintiffs and Counter-Defendants
 AVAGO TECHNOLOGIES U.S., INC., AVAGO
 7 TECHNOLOGIES INTERNATIONAL SALES
 PTE. LIMITED, AVAGO TECHNOLOGIES
 8 JAPAN, LTD., AVAGO TECHNOLOGIES
 CANADA CORPORATION
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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 AVAGO TECHNOLOGIES U.S., INC., a
 Delaware corporation, AVAGO
 13 TECHNOLOGIES INTERNATIONAL
 SALES PTE. LIMITED, AVAGO
 14 TECHNOLOGIES JAPAN, LTD.,
 AVAGO TECHNOLOGIES CANADA
 15 CORPORATION,

16 Plaintiffs,

17 v.

18 EMCORE CORPORATION, VENTURE
 CORPORATION LIMITED fka
 19 VENTURE MANUFACTURING (S)
 LTD.,

20 Defendants.

21 AND RELATED COUNTERCLAIM.

Case No. 08-CV-03248 JW

**STIPULATED MODIFICATION OF CASE
 SCHEDULE, AND [PROPOSED] ORDER**

**Civ. L.R. 6-2
 Civ. L.R. 16-10(c)**

22 Pursuant to Civil Local Rules 6-2 and 16-10(c), Plaintiffs and Counterdefendants
 23 AVAGO TECHNOLOGIES U.S., INC., AVAGO TECHNOLOGIES INTERNATIONAL
 24 SALES PTE. LIMITED, AVAGO TECHNOLOGIES JAPAN, LTD., AVAGO
 25 TECHNOLOGIES CANADA CORPORATION (“Avago”), Defendant and Counterclaimant
 26 VENTURE CORPORATION LIMITED fka VENTURE MANUFACTURING (S) LTD. and
 27 Counterclaimant TECHNOCOM SYSTEMS SDN BHD (“Venture”) and Defendant EMCORE
 28 CORPORATION (“Emcore”), **hereby request that the Court modify the current Case**

1 **Schedule, ¶¶ 9-12, to extend each of the deadlines therein by not less than forty-five (45)**
2 **days.** The Court has previously modified the Case Schedule, most recently on September 9,
3 2010, Docket No. 108.

4 The parties make this request based on the fact the parties have entered into settlement
5 discussions. By moving the current deadlines, the parties will be able to direct their full attention
6 to the negotiated resolution that would otherwise need to be spent preparing for upcoming trial
7 deadlines, including expert-witness related deadlines.

8 Avago and Venture are conducting settlement discussions directly through counsel and
9 with the ultimate goal of reaching a negotiated resolution.

10 Avago and Emcore are in the process of scheduling a formal mediation. The parties have
11 agreed to mediate on April 26, 2011, and are working to secure a mediator for that day.

12 In order to provide the parties with the time necessary to conduct a formal mediation and
13 negotiate a resolution of the disputes, the parties respectfully request that the Court issue a further
14 Modified Scheduling Order adjusting the Case Schedule, ¶¶ 9-12, by approximately, but not less
15 than forty-five days, corresponding to the time between now and the mediation between Avago
16 and Emcore, to better enable the parties to resolve their disputes. In the event they are unable to
17 settle the case, the parties will thereafter resume their trial preparation efforts.

18 **SO STIPULATED.**

19
20 Dated: March 21, 2011

HOPKINS & CARLEY
A Law Corporation

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23 By: /s/ Erik P. Khoobyarian

Erik P. Khoobyarian
Attorneys for Plaintiffs and
Counter-Defendants
AVAGO TECHNOLOGIES U.S., INC.,
AVAGO TECHNOLOGIES
INTERNATIONAL SALES PTE. LIMITED,
AVAGO TECHNOLOGIES JAPAN, LTD.,
AVAGO TECHNOLOGIES CANADA
CORPORATION

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Dated: March 21, 2011

WHITE & CASE LLP

By: /s/ Matthew P. Lewis
Matthew P. Lewis
Attorneys for Defendant and Counterclaimant
VENTURE CORPORATION LIMITED fka
VENTURE MANUFACTURING (S) LTD.
and Counterclaimant TECHNOCOM
SYSTEMS SDN BHD

Dated: March 21, 2011

REDENBACHER & BROWN, LLP

By: /s/ John C. Brown
John C. Brown
Attorneys for Defendant
EMCORE CORPORATION

ATTESTATION OF ERIK P. KHOOBYARIAN

I, Erik P. Khoobyarian, am one of the attorneys of record for Plaintiffs and Counter Defendants AVAGO TECHNOLOGIES U.S., INC., AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED, AVAGO TECHNOLOGIES JAPAN, LTD., and AVAGO TECHNOLOGIES CANADA CORPORATION. I have obtained concurrence in the filing of this document from John C. Brown, attorney of record for Defendant EMCORE CORPORATION; Matthew P. Lewis attorney of record for Defendant and Counterclaimant VENTURE CORPORATION LIMITED fka VENTURE MANUFACTURING (S) LTD. and Counterclaimant TECHNOCOM SYSTEMS SDN BHD, which shall serve in lieu of his signature on the filed document. I have obtained and will maintain records to support this concurrence for subsequent production for the court if so ordered or for inspection upon request by a party until one year after final resolution of the action (including appeal, if any).

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1 Dated: March 21, 2011

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By: /s/ Erik P. Khoobyarian
Erik P. Khoobyarian

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ORDER

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IT IS SO ORDERED. The Court finds good cause to extend the current case schedule.

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Accordingly, the Court modifies the current Case Schedule, dated September 9, 2010, Docket No.

8

108, as follows:

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Close of All Discovery (¶ 9)	September 26, 2011
Last Date for Hearing Dispositive Motions (¶ 10)	November 21, 2011
Preliminary Pretrial Conference at 11 a.m. (¶ 12)	August 29, 2011
Preliminary Pretrial Conference Statements (¶ 11) (Due 10 days before conference)	August 19, 2011

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DATED: March 24, 2011


JAMES WARE
United States District Judge

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