

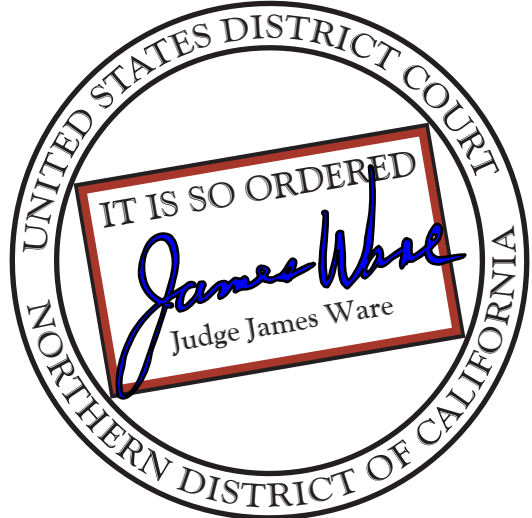
1 Linda S. DeBruin  
 (Admitted to this Court on September 27,1991)  
 2 Aaron D. Charfoos (*pro hac vice*)  
 Meredith Zinanni (*pro hac vice*)  
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12 *Attorneys for Defendants*  
 13 RESEARCH IN MOTION LIMITED and  
 RESEARCH IN MOTION CORPORATION

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN FRANCISCO DIVISION

17 INFORMATION TECHNOLOGIES, INC., a  
 Delaware corporation,  
 18  
 Plaintiff,  
 19  
 v.  
 20 RESEARCH IN MOTION LIMITED, a  
 21 Canadian corporation  
 22 AND  
 23 RESEARCH IN MOTION CORPORATION,  
 24 a Delaware corporation,  
 25  
 Defendants.



Case No. 5:08-CV-04990-JW  
 Jury Trial Demanded

**STIPULATION AND ~~PROPOSED~~ ORDER  
 PURSUANT TO CIVIL LOCAL  
 RULES 6-2 AND 7-12 REGARDING  
 DATE OF ORDERED DEPOSITION**

1 WHEREAS this Court has ordered Defendants Research In Motion Ltd. and Research In  
2 Motion Corp. (collectively, "RIM") to depose Plaintiff Mformation Technologies, Inc.  
3 ("Mformation") pursuant to Fed. R. Civ. P. 30(b)(6) with respect to the late-disclosed 2000 source  
4 code on or before February 28, 2012 (Dkt. 700 ¶ 1); and

5 WHEREAS RIM and Mformation jointly agree that a deposition on February 29, 2012 would  
6 not affect any other deadlines for this case and would be more convenient for the witness and the  
7 parties;

8 THEREFORE the parties jointly stipulate that RIM shall conduct its deposition of  
9 Mformation pursuant to Fed. R. Civ. P. 30(b)(6) beginning at 10:00 AM on Wednesday,  
10 February 29, 2012, at Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022.

11 Pursuant to L.R. 6-2(a), the Declaration of Meredith Zinanni in Support of the Stipulation  
12 Regarding Date of Ordered Deposition is filed herewith.

13 DATED: February 14, 2012

FOLEY & LARDNER LLP

14  
15 By: /s/ Shawn E. McDonald  
16 Amar L. Thakur  
Shawn E. McDonald  
Justin E. Gray

17 *Attorneys for Mformation Technologies, Inc.*

18  
19 DATED: February 14, 2012

KIRKLAND & ELLIS LLP

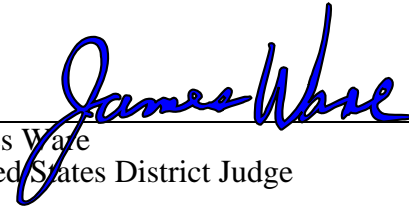
20  
21 By: /s/ Meredith Zinanni  
22 Linda S. DeBruin  
23 Marc H. Cohen (CA Bar No. 168773)  
Aaron D. Charfoos  
Maria A. Maras  
Meredith Zinanni

24 *Attorneys for Research In Motion Limited and  
25 Research In Motion Corporation*

26 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Meredith  
27 Zinanni hereby attests that concurrence in the filing of this document has been obtained.  
28

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Date: February 14 \_\_\_\_\_, 2012

  
\_\_\_\_\_  
James W. White  
United States District Judge

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**CERTIFICATE OF SERVICE**

I hereby certify on this 14th day of February, 2012 that a copy of the foregoing was filed electronically through the Court's CM/ECF system, with notice of case activity automatically generated and sent electronically to all parties.

DATED: February 14, 2012

KIRKLAND & ELLIS LLP  
Respectfully submitted,

/s/ John Kanive  
John Kanive  
Intellectual Property Legal Assistant

Linda S. DeBruin  
(Admitted to this Court on September 27, 1991)  
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Meredith Zinanni (*pro hac vice*)  
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