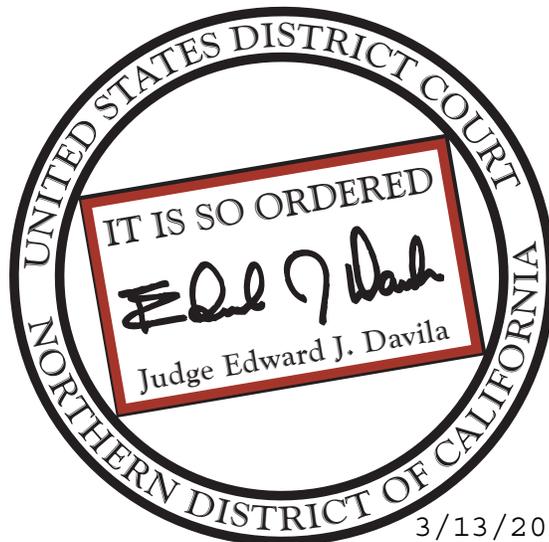


1 COOLEY LLP
 2 RONALD S. LEMIEUX (120822)
 (rlemieux@cooley.com)
 3 VIDYA R. BHAKAR (220210)
 (vbhakar@cooley.com)
 4 CARRIE J. RICHEY (20825)
 (crichey@cooley.com)
 5 3000 El Camino Real
 Five Palo Alto Square
 Palo Alto, CA 94306-2155
 6 Telephone: 650-843-5000
 Facsimile: 650-849-7400

7
 8 Attorneys for Defendant and Counterclaimant
 CHIPMOS TECHNOLOGIES, INC.

9 JONES DAY
 GREG L. LIPPETZ (154228)
 10 glippetz@jonesday.com
 JACQUELINE K. S. LEE (247705)
 11 jkslee@jonesday.com
 1755 Embarcadero Road
 12 Palo Alto, California 94303
 Telephone: (650) 739-3939
 13 Facsimile: (650) 739-3900

14 Attorneys for Plaintiff and
 Counterclaim Defendant
 15 FREESCALE SEMICONDUCTOR, INC.



3/13/2013

16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN JOSE DIVISION

19 FREESCALE SEMICONDUCTOR, INC.,
 a corporation,
 20
 Plaintiff,
 21
 vs.
 22
 23 CHIPMOS TECHNOLOGIES, INC., a
 corporation,
 24
 Defendant.

CASE NO. 5:09-CV-03689-EJD

**STIPULATION TO PERMIT CHIPMOS
 TECHNOLOGIES, INC. TO FILE UNDER
 SEAL PORTIONS OF ITS MOTION FOR
 LEAVE TO FILE MOTION FOR
 RECONSIDERATION AND MEMORANDUM
 OF POINTS AND AUTHORITIES IN
 SUPPORT THEREOF**

JURY TRIAL DEMANDED

25
 26 AND RELATED COUNTERCLAIMS.

Complaint filed: July 13, 2009
 Trial Date: TBD

Courtroom: 4, 5th Floor
 Judge: Hon. Edward J. Davila

27
 28 CASE NO. 5:09-CV-03689-EJD

STIP. TO PERMIT CHIPMOS TO FILE UNDER
 SEAL PORTIONS OF ITS MOTION FOR LEAVE
 TO FILE MOTION FOR RECONSIDERATION

1 Pursuant to Local Rules 7-11(a) and 79-5(b), (d), Plaintiff Freescale Semiconductor, Inc.
2 (“Freescale”) and Defendant ChipMOS Technologies, Inc. (“ChipMOS”) jointly submit this
3 Stipulation To Permit ChipMOS Technologies, Inc. To File Under Seal Portions of Its Motion for
4 Leave To File Motion for Reconsideration and Memorandum of Points and Authorities in Support
5 Thereof.

6 WHEREAS ChipMOS will file on March 12, 2013, its Motion for Leave To File Motion
7 for Reconsideration and Memorandum of Points and Authorities in Support Thereof;

8 WHEREAS portions of ChipMOS’ Motion discuss and quote documents designated by
9 Freescale as Protected Material pursuant to the Protective Order entered in this case
10 (Dkt. No. 48);

11 WHEREAS ChipMOS has filed an Administrative Motion To File Under Seal Portions of
12 this Motion and accompanying Memorandum of Points and Authorities in Support Thereof; and

13 WHEREAS the requested relief is necessary and narrowly tailored to protect the alleged
14 confidentiality of the materials submitted in support of ChipMOS’ Motion for Leave To File
15 Motion for Reconsideration until such time as the Court makes a final ruling as to the
16 confidentiality of the relevant subject matter.

17 NOW THEREFORE IT IS HEREBY STIPULATED by the Parties, through their
18 respective counsel of record, that ChipMOS is permitted to move for permission to file under seal
19 portions of ChipMOS’ Motion for Leave To File Motion for Reconsideration and Memorandum
20 of Points and Authorities in Support Thereof.

21 While the Parties agree that portions of the concurrently filed ChipMOS’ Motion for
22 Leave To File Motion for Reconsideration may be publicly filed, the Parties also agree that the
23 filing shall not be construed as a waiver of any confidentiality designation or other protection
24 with respect to documents, transcripts, or other information referred to in, or that serve as the
25 basis for, the allegations or arguments made in them.

26 //

27 //

28 //

