

1 Greg L. Lippetz (State Bar No. 154228)  
 glippetz@jonesday.com  
 2 Jacqueline K. S. Lee (State Bar No. 247705)  
 jkslee@jonesday.com  
 3 JONES DAY  
 1755 Embarcadero Road  
 4 Palo Alto, CA 94303  
 Telephone: 650-739-3939  
 5 Facsimile: 650-739-3900

6 Attorneys for Plaintiff and  
 Counterclaim Defendant  
 7 FREESCALE SEMICONDUCTOR, INC.

RONALD S. LEMIEUX (SB# 120822)  
 ronlemieux@paulhastings.com  
 VIDYA R. BHAKAR (SB# 220210)  
 vbhakar@cooley.com  
 SHANEE Y.W. NELSON (SB# 221310)  
 shaneenelson@paulhastings.com  
 COOLEY LLP  
 3000 El Camino Real  
 Five Palo Alto Square  
 Palo Alto, CA 94306-2155  
 Telephone: (650) 843-5000  
 Facsimile: (650) 849-7400

Attorneys for Defendant and  
 Counterclaim-Plaintiff  
 CHIPMOS TECHNOLOGIES, INC

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 10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN JOSE DIVISION

13 Freescale Semiconductor, Inc.,  
 14 Plaintiff,  
 15 v.  
 16 ChipMOS Technologies, Inc.,  
 17 Defendant.

Case No. C-09-03689-JF-RS

**STIPULATED REQUEST AND  
 [PROPOSED] ORDER TO EXTEND  
 TIME FOR EXPERT DISCOVERY**

Date: N/A  
 Time: N/A  
 Courtroom: 3, 5th Floor  
 Judge: Hon. Jeremy Fogel

19 Pursuant to Local Rule 6-2, Plaintiff Freescale Semiconductor, Inc. (“Freescale”) and  
 20 Defendant ChipMOS Technologies, Inc. (“ChipMOS,” and together with Freescale, the “Parties”)  
 21 jointly submit this stipulated request to extend time for expert discovery.

22 The April 1, 2011 Joint Scheduling Order set an expert discovery cut-off date of June 17,  
 23 2011. *See* ECF No. 72. Freescale’s expert Dr. Robert G. Harris will be out of the country and  
 24 thus unavailable for deposition through June 19, 2011. Accordingly, the parties have agreed to  
 25 schedule Dr. Harris’s deposition for June 29, 2011. The Parties jointly request that the date for  
 26 the close of expert discovery be extended to June 29, 2011, for the limited purpose of allowing  
 27 Dr. Harris’s deposition to be taken.

28 This request for an extension is supported by the Declaration of Greg L. Lippetz, filed

1 concurrently herewith.

2 **IT IS SO STIPULATED.**

3 Dated: June 7, 2011

JONES DAY

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By: /s/ Greg L. Lippetz  
Greg L. Lippetz

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Counsel for Plaintiff  
FREESCALE SEMICONDUCTOR, INC.

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In accordance with General Order No. 45, Section X(B), the above signatory attests that

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Concurrence in the filing of this document has been obtained from the signatory below.

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Dated: June 7, 2011

COOLEY LLP

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By: /s/ Ronald S. Lemieux  
Ronald S. Lemieux

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Counsel for Defendant  
CHIPMOS TECHNOLOGIES, INC.

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**IT IS SO ORDERED.**

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DATED: 6/8/11

By:   
Hon. Jeremy Fogel

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