

1 Ronald J. Schutz (*Pro Hac Vice* pending), RJSchutz@rkmc.com  
 2 Richard M. Martinez (*Pro Hac Vice*), RMMartinez@rkmc.com  
 3 Sang Young A. Brodie (*Pro Hac Vice*), SYBrodie@rkmc.com  
**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**  
 4 800 LaSalle Avenue, 2800 LaSalle Plaza  
 5 Minneapolis, MN 55402  
 Telephone: (612) 349-8500  
 Facsimile: (612) 339-4181

**\*\* E-filed July 29, 2010 \*\***

6 David Martinez, (CA Bar No. 193183), DMartinez@rkmc.com  
**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**  
 7 2049 Century Park East, Suite 3400  
 Los Angeles, CA 90067-3208  
 Telephone: (310) 552-0130  
 Facsimile: (310) 229-5800

8 Attorneys for Plaintiff,  
 9 TV INTERACTIVE DATA CORPORATION

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12 TV INTERACTIVE DATA CORPORATION, a  
 13 California Corporation,

14 Plaintiff,

15 v.

16 SONY CORPORATION; SONY COMPUTER  
 17 ENTERTAINMENT INC.; SONY COMPUTER  
 ENTERTAINMENT AMERICA, INC.; SONY  
 18 CORPORATION OF AMERICA; SONY  
 ELECTRONICS, INC.; SAMSUNG ELECTRONICS  
 CO., LTD.; SAMSUNG ELECTRONICS AMERICA,  
 19 INC.; ROYAL PHILIPS ELECTRONICS N.V.;  
 PHILIPS ELECTRONICS NORTH AMERICA  
 CORPORATION; TOSHIBA CORPORATION;  
 20 TOSHIBA AMERICA, INC.; TOSHIBA AMERICA  
 CONSUMER PRODUCTS, L.L.C.; PANASONIC  
 CORPORATION; PANASONIC CORPORATION  
 21 OF NORTH AMERICA; VICTOR COMPANY OF  
 JAPAN, LTD.; JVC AMERICAS CORP.; LG  
 22 ELECTRONICS, INC.; LG ELECTRONICS U.S.A.,  
 INC.; ZENITH ELECTRONICS LLC; PIONEER  
 CORPORATION; PIONEER ELECTRONICS (USA)  
 23 INC.; SHARP CORPORATION; SHARP  
 ELECTRONICS CORPORATION; FUNAI  
 ELECTRIC CO., LTD.; FUNAI CORPORATION,  
 24 INC.; D&M HOLDINGS INC.; D&M HOLDINGS  
 US, INC.; DENON ELECTRONICS (USA), LLC,  
 25

26 Defendants.  
 27  
 28

**Case No. 10-00475 JF/HL**

**STIPULATION AND**  
~~**PROPOSED**~~ **ORDER**  
**REGARDING EXPERT**  
**DISCOVERY**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The parties hereby agree and stipulate as follows, subject to approval by this Court:

1. Expert-related written discovery in the above-captioned action shall be limited to the final expert reports, as well as any and all documents, materials, and/or other information the experts reviewed in reaching their opinions (whether affirmative or rebuttal opinions), except as otherwise provided in this stipulation.

2. The following shall be produced on the date expert disclosures are due: (a) expert reports, (b) any documents, materials and/or other information the experts reviewed in reaching their opinions, except as otherwise provided in this stipulation. To the extent any such documents, materials, and/or other information already has been produced in the litigation, the producing party may instead produce a schedule listing such documents and information by Bates number and any other information sufficient to identify the document and its location.

3. The parties and experts need not retain, produce or testify about drafts of the required expert reports (or related demonstratives and exhibits), other work product prepared by or for the experts or their staff, or notes, emails or other communications made in connection with the drafting of the reports.

AGREED and STIPULATED

I David Martinez, the filer of this document, attest that concurrence in the filing of this document has been obtained from each of the other signatories below.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By: /s/David Martinez  
Ronald J. Schutz (*Pro Hac Vice* pending)  
Richard M. Martinez (*Pro Hac Vice*)  
Sang Young A. Brodie (*Pro Hac Vice*)  
**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**  
800 LaSalle Avenue, 2800 LaSalle Plaza  
Minneapolis, MN 55402  
Telephone: (612) 349-8500  
Facsimile: (612) 339-4181

David Martinez, (CA Bar No. 193183)  
**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**  
2049 Century Park East, Suite 3400  
Los Angeles, CA 90067-3208  
Telephone: (310) 552-0130  
Facsimile: (310) 229-5800

**ATTORNEYS FOR PLAINTIFF  
TV INTERACTIVE DATA CORPORATION**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**MORRISON & FOERSTER LLP**

By: /s/Rick S. Ballinger  
Karl J. Kramer  
Rick S. Ballinger  
**MORRISON & FOERSTER LLP**  
755 Page Mill Road  
Palo Alto, CA 94304  
Telephone: (650) 813-5775  
Facsimile: (650) 494-0792

Jack W. Londen  
**MORRISON & FOERSTER LLP**  
Shin-Marunouchi 1-Chome  
Tokyo, Chiuoda-ku 100-6529, Japan  
Telephone: +81-3-3214-6522

**ATTORNEYS FOR DEFENDANTS D&M HOLDINGS INC.; D&M HOLDINGS US, INC.; AND DENON ELECTRONICS (USA), LLC**

DATED: July 23, 2010

**BAKER & HOSTETLER, LLP**

By: /s/Kevin W. Kirsch  
Kevin W. Kirsch  
John F. Bennett  
Matthew P. Hayden  
David A. Mancino  
**BAKER & HOSTETLER, LLP**  
312 Walnut Street, Suite 3200  
Cincinnati, OH 45202  
Telephone: (513) 929-3499  
Facsimile: (513) 929-0303

Hayes F. Michel  
**BAKER & HOSTETLER, LLP**  
12100 Wilshire Blvd.  
Los Angeles, CA 90025  
Telephone: (310) 979-8460  
Facsimile: (310) 820-8859

**ATTORNEYS FOR DEFENDANTS FUNAI ELECTRONIC CO. LTD. AND FUNAI CORPORATION, INC.**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**ROTHWELL, FIGG, ERNST & MANBECK**

By: /s/Brian A. Tollefson  
Steve Lieberman  
Joo Mee Kim  
Brian A. Tollefson  
**ROTHWELL, FIGG, ERNST & MANBECK**  
1425 K Street/Suite 800  
Washington, DC 20005  
Telephone: (202) 783-6040  
Facsimile: (202) 783-6031

Clement L. Glynn  
Lucas V. Munoz  
**GLYNN & FINLEY**  
One Walnut Creek Center  
100 Pringle Ave./Suite 500  
Walnut Creek, CA 94596  
Telephone: (925) 210-2801  
Facsimile: (925) 945-1975

**ATTORNEYS FOR DEFENDANTS LG  
ELECTRONICS, INC.; LG ELECTRONICS  
U.S.A., INC.; AND ZENITH ELECTRONICS  
LLC**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**HOWREY LLP**

By: /s/ Jason T. Anderson  
Jason T. Anderson  
Christina Finn  
**HOWREY LLP**  
1950 University Ave./4th Floor  
East Palo Alto, CA 94303  
Telephone: (650) 798-3544  
Facsimile: (650) 429-2096

Alan Grimaldi  
Brian Rosenthal  
**HOWREY LLP**  
1299 Pennsylvania Ave., N.W.  
Washington, DC 20004  
Telephone: (202) 383-6989  
Facsimile: (202) 383-6610

**ATTORNEYS FOR DEFENDANTS ROYAL  
PHILIPS ELECTRONICS N.V. AND PHILIPS  
ELECTRONICS NORTH AMERICA  
CORPORATION**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**MORRISON & FOERSTER LLP**

By: /s/Sherman W. Kahn  
Karen Hagberg  
Sherman W. Kahn  
Hui Liu

**MORRISON & FOERSTER LLP**  
1290 Avenue of the Americas  
New York, NY 10104  
Telephone: (212) 468-8032  
Facsimile: (212) 468-7900

**ATTORNEYS FOR DEFENDANTS PIONEER CORPORATION AND PIONEER ELECTRONICS (USA) INC.**

DATED: July 23, 2010

**MORRISON & FOERSTER LLP**

By: /s/Sherman W. Kahn  
Karen Hagberg  
Sherman W. Kahn  
Hui Liu

**MORRISON & FOERSTER LLP**  
1290 Avenue of the Americas  
New York, NY 10104  
Telephone: (212) 468-8032  
Facsimile: (212) 468-7900

**ATTORNEYS FOR DEFENDANTS SHARP CORPORATION AND SHARP ELECTRONICS CORPORATION**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**COVINGTON & BURLING LLP**

By: /s/Nathan E. Shafroth  
Nathan E. Shafroth  
**COVINGTON & BURLING LLP**  
One Front Street  
San Francisco, CA 94111  
Telephone: (415) 591-7053  
Facsimile: (415) 955-6503

Richard L. Rainey  
**COVINGTON & BURLING LLP**  
1201 Pennsylvania Avenue N.W.  
Washington, DC 20004  
Telephone: (202) 662-5441

Robert T. Haslam  
**COVINGTON & BURLING LLP**  
333 Twin Dolphin Drive  
Redwood Shores, CA 94062  
Telephone: (650) 632-4702

**ATTORNEYS FOR DEFENDANTS  
SAMSUNG ELECTRONICS CO., LTD. AND  
SAMSUNG ELECTRONICS AMERICA, INC.**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**LERNER, DAVID, LITTENBERG,  
KRIMHOLZ & MENTLIK, L.L.P.**

By: /s/Jonathan A. David  
Gregory S. Gewirtz  
Jonathan A. David  
Bryan J. Sommese  
**LERNER, DAVID, LITTENBERG,  
KRIMHOLZ & MENTLIK, L.L.P.**  
600 South Avenue West  
Westfield, NJ 07090  
Telephone: (612) 349-8500  
Facsimile: (612) 339-4181

Duane M. Geck  
Philip Barilovits  
**SEVERSON & WERSON**  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
Telephone: (415) 677-5501  
Facsimile: (415) 596-0439

**ATTORNEYS FOR DEFENDANTS SONY  
COMPUTER ENTERTAINMENT AMERICA  
LLC; SONY CORPORATION OF AMERICA;  
SONY ELECTRONICS, INC.; SONY  
CORPORATION; AND SONY COMPUTER  
ENTERTAINMENT INC.**

DATED: July 23, 2010

**DLA PIPER LLP**

By: /s/Ronald L. Yin  
Ronald L. Yin  
Mark D. Fowler  
Gerald T. Sekimura  
Sal Lim  
Erik R. Fuehrer  
**DLA PIPER LLP**  
2000 University Ave.  
East Palo Alto, CA 94303  
Telephone: (650) 833-2437  
Facsimile: (650) 687-1208

**ATTORNEYS FOR DEFENDANTS TOSHIBA  
CORPORATION; TOSHIBA AMERICA, INC.;  
AND TOSHIBA AMERICA CONSUMER  
PRODUCTS, L.L.C.**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: July 23, 2010

**ORRICK, HERRINGTON & SUTCLIFFE LLP**

By: /s/Trevor C. Hill  
Steven J. Routh  
Sten A. Jensen  
Trevor C. Hill  
T. Vann Pearce, Jr.  
**ORRICK, HERRINGTON & SUTCLIFFE LLP**  
1152 15th Street, NW  
Washington, DC 20005  
Telephone: (202) 339-8696  
Facsimile: (202) 339-8500

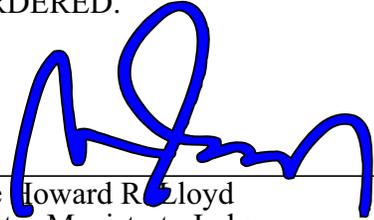
William H. Wright  
**ORRICK, HERRINGTON & SUTCLIFFE LLP**  
777 South Figueroa St., Suite 3200  
Los Angeles, CA 90017  
Telephone: (213) 612-2478

**ATTORNEYS FOR DEFENDANTS VICTOR  
COMPANY OF JAPAN, LTD. AND JVC  
AMERICAS CORP.**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 29, 2010

  
\_\_\_\_\_  
Honorable Howard R. Lloyd  
United States Magistrate Judge



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**[X]** **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**[]** **BY FEDERAL EXPRESS - OVERNIGHT:** I caused such envelope to be deposited in a box or other facility regularly maintained by Federal Express in an envelope or package designated by Federal Express with delivery fees paid.

**[]** **BY ELECTRONIC MEANS:** I served a true copy of the document(s) described on all parties to this action by electronic means.

**[X]** (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on July 23, 2010 at Los Angeles, California.

\_\_\_\_\_  
/s/ Lilia Duarte  
Lilia Duarte