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[COMPLETE LIST OF COUNSEL
IDENTIFIED ON SIGNATURE PAGES]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

TV INTERACTIVE DATA
CORPORATION,

Plaintiff,

v.

SONY CORPORATION, et al.,

Defendants.

Case No. 10-CV-00475-JF

**STIPULATION AMONG
PLAINTIFF TV INTERACTIVE
DATA CORPORATION AND
DEFENDANTS CONCERNING
DR. ANDREW WOLFE AND
[PROPOSED] ORDER**

1
2 WHEREAS Defendants Funai Electric Co., Ltd. and Funai Corporation, Inc.
3 (collectively, the “Funai Defendants”) have notified TVI and the other parties that
4 the Funai Defendants believe that they have a basis to object to the designation of
5 Dr. Andrew Wolfe by TVI as a testifying expert on the grounds that Dr. Andrew
6 Wolfe is a named inventor on multiple patent applications that members of the
7 Funai Defendants’ litigation team are currently prosecuting;

8 WHEREAS Plaintiff TVI does not agree that the Funai Defendants have a
9 basis to object to the designation of Dr. Andrew Wolfe by TVI as a testifying expert
10 in this case; and

11 WHEREAS, to resolve the Funai Defendants’ alleged basis for such an
12 objection, TVI and Defendants have agreed to an evidentiary bar relating to (1) the
13 relationship between or among Dr. Wolfe, Baker & Hostetler LLP, the specific
14 attorneys prosecuting the patent applications and/or the entity for whom Baker &
15 Hostetler LLP is prosecuting the patent applications; (2) the fact that Baker &
16 Hostetler LLP and the specific attorneys prosecuting the patent applications
17 prosecuted such patent applications in which Dr. Wolfe is a named inventor; and
18 (3) the fact that Baker & Hostetler LLP and the specific attorneys prosecuting the
19 patent applications prosecuted such patent applications on behalf of the entity for
20 whom Baker & Hostetler LLP is prosecuting the patent applications.

21 IT IS HEREBY STIPULATED AND AGREED as follows:

22 Neither TVI, Defendants, the parties’ attorneys, the parties’ representatives,
23 nor Dr. Wolfe may reference in any further Court filing, Court hearing or jury trial
24 in this case:

25 (1) the relationship between or among Dr. Wolfe, Baker & Hostetler
26 LLP, the specific attorneys prosecuting the patent applications and/or the
27 entity for whom Baker & Hostetler LLP is prosecuting the patent
28 applications;

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(2) the fact that Baker & Hostetler LLP and the specific attorneys prosecuting the patent applications prosecuted such patent applications in which Dr. Wolfe is a named inventor; and

(3) the fact that Baker & Hostetler LLP and the specific attorneys prosecuting the patent applications prosecuted such patent applications on behalf of the entity for whom Baker & Hostetler LLP is prosecuting the patent applications.

Notwithstanding the above general agreement, all parties to this Stipulation reserve the right to: (1) request the Court to enforce the Stipulation in the event of an alleged breach; and (2) seek appropriate relief from the Court in the event of an alleged breach. TVI and Dr. Wolfe further reserve the right to respond should any Defendant or a non-party raise the relationship between Dr. Wolfe and Baker & Hostetler LLP. Nothing in this Stipulation shall be considered a waiver of Defendants' rights to object to Dr. Wolfe on other grounds.

In addition, TVI and Dr. Wolfe reserve the right to enforce the STIPULATION AMONG PLAINTIFF TV INTERACTIVE DATA CORPORATION AND THE FUNAI DEFENDANTS CONCERNING DR. ANDREW WOLFE AND [PROPOSED] ORDER, which was separately filed with the Court.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/23/10, 2010

/s/
Honorable Jeremy Fogel
United States District Judge

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Dated: November 22, 2010

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I, Kevin W. Kirsch, am the ECF user whose ID and password are being used to file this STIPULATION AMONG PLAINTIFF TV INTERACTIVE DATA CORPORATION AND DEFENDANTS CONCERNING DR. ANDREW WOLFE AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that Sang Young A. Brodie, Gregory S. Gewirtz, Jason T. Anderson, Ronald L. Yin, William H. Wright, Sherman W. Kahn, and Karl J. Kramer have concurred in this filing.

Dated: November 22, 2010

/s/ Kevin W. Kirsch
Kevin W. Kirsch

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CERTIFICATE OF SERVICE

I declare that I am employed with the law firm of Baker & Hostetler LLP, whose address is 312 Walnut Street, Suite 3200, Cincinnati, Ohio 45202. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on November 22, 2010, I served the following:

STIPULATION AMONG PLAINTIFF TV INTERACTIVE DATA CORPORATION AND DEFENDANTS CONCERNING DR. ANDREW WOLFE AND [PROPOSED] ORDER



BY ELECTRONIC SERVICE by electronically mailing a true and correct copy through Baker & Hostetler LLP's electronic mail system to the e-mail addresses set forth below per agreement of the parties in accordance with Fed. R. Civ. P. 5(b).

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BY MAIL by placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Cincinnati, Ohio, in sealed envelopes with postage fully prepaid.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2010, 2010, in Cincinnati, Ohio.

/s/ John F. Bennett
John F. Bennett