

1 **JOINT STIPULATION**

2 Beginning on or about October 17, 2011, TV Interactive Data Corp. (“TVI”) will begin
3 depositions of certain witnesses from Funai Electric Co. Ltd. (“Funai”) at the U.S. Consulate in
4 Osaka-Kobe. TVI and Funai hereby submit and jointly stipulate to the following Proposed
5 Order/Commission for Depositions to be Taken in Japan.
6

7 **FOR PLAINTIFF TV INTERACTIVE DATA CORP.**

8 ROBINS, KAPLAN, MILLER & CIRESI,
9 L.L.P.

10 By: /s/ Sang Young A. Brodie
Sang Young A. Brodie (pro hac vice)
11 E-mail: sybrodie@rkmc.com
Richard M. Martinez (pro hac vice)
12 E-mail: rmmartinez@rkmc.com
Trevor J. Foster (pro hac vice)
13 E-mail: tjfoster@rkmc.com
Victor C. Chan (pro hac vice)
14 E-mail: vcchan@rkmc.com
15

16 Dated: August 31, 2011

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18 **FOR DEFENDANT FUNAI ELECTRIC CO., LTD. AND INDIVIDUAL DEPONENTS:**

19 BAKER & HOSTETLER, LLP

20 By: /s/ Kevin W. Kirsch
Kevin W. Kirsch
21 E-mail: kkirsch@bakerlaw.com
David A. Mancino
22 E-mail: dmancino@bakerlaw.com
John F. Bennett
23 E-mail: jbenett@bakerlaw.com
24

25 Dated: August 31, 2011

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1 I, Sang Young A. Brodie, am the ECF user whose User ID and Password are being
2 utilized in the electronic filing of the STIPULATION AND [PROPOSED]
3 ORDER/COMMISSION FOR DEPOSITIONS TO BE TAKEN IN JAPAN. Pursuant to the
4 Northern District of California's General Order 45(X)(B), I attest that concurrence in the filing
5 has been obtained from Kevin W. Kirsch.

6 Dated: August 31, 2011

/s/ Sang Young A. Brodie
Sang Young A. Brodie

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1 ~~PROPOSED~~ **ORDER/COMMISSION FOR DEPOSITIONS TO BE TAKEN IN JAPAN**

2 TO: ANY CONSUL OR VICE CONSUL OF THE UNITED STATES OF AMERICA
3 AT OSAKA-KOBE, JAPAN

4 Upon the application of Complainant TV Interactive Data Corporation (“TVI”), in *TVI*
5 *Data Corp. v. Sony Corp., et al.*, Inv. No. 10-00475, before the U.S. District Court for the
6 Northern District of California, and pursuant to Article 17 of the United States – Japan Consular
7 Convention,

8 **IT IS ORDERED THAT** the depositions on notice of the following witnesses may be
9 taken at the U.S. Consulate in Osaka-Kobe, Japan, on one or more dates during the period from
10 on or about October 17, 2011, at 8:30 a.m. to on or about November 10, 2011 at 4:00 p.m. as
11 follows, and that any documentary exhibits in connection therewith be marked:

12 **1. Fed. R. Civ. P., Rule 30(B)(6) deposition of Funai Electric Co., Ltd.**

13 **Funai Electric Co., Ltd.**
14 7-7-1 Nakagaito, Daito City
15 Osaka 574-0013, Japan

16 Potential witnesses for the Fed. R. Civ. P., Rule 30(B)(6) deposition of Funai Electric Co.
17 include, at the discretion of Funai Electric Co., any combination of one or more of the following:

18 Goro Seki	Tadashi Shimoguchi
19 Kazuyuki Fujiwara	Tsuyoshi Kamitani
20 Yoshikazu Fujita	Hideo Saito
21 Makato Takemoto	Hiroki Nakamura
22 Shigeru Yokota	Jun Tateishi
23 Yoichi Kanazawa	Mr. Onishi
24 Kozo Wada	

25 **2. Fed. R. Civ. P., Rule 30(B)(1) depositions of individuals**

26 Potential witnesses for depositions under Fed. R. Civ. P., Rule 30(B)(1) include:

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2 Goro Seki
3 Kazuyuki Fujiwara
4 Yoshikazu Fujita
5 Shinji Seki
6 Makato Takemoto
7 Shigeru Yokota
8 Yoichi Kanazawa

Kozo Wada
Tadashi Shimoguchi
Tsuyoshi Kamitani
Hideo Saito
Hiroki Nakamura
Jun Tateishi
Mr. Onishi

9 Counsel for Defendant Funai Electric Co. who will participate in said depositions are
10 Kevin W. Kirsch, David A. Mancino, and John F. Bennett. In addition, William Mangioni-Smith
11 may attend on behalf of Funai Electric Co.

12 Members of Funai Electric Co's Intellectual Property Group that may attend the
13 depositions include Hisao Tatsumi, Goro Seki, Hiroki Nakamura and Takafumi Ishii.

14 Check interpreters that may be attending the depositions include:

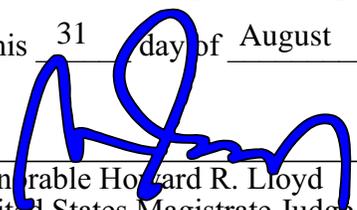
15 Yoshiyuki Onishi
16 Christopher Field
17 Asami Isomichi
18 Mia Matsumura
19 Junko Sumida
20 Toyu Yazaki
21 Ellen Shang Travis

22 Counsel for TVI who will participate in said depositions are Richard M. Martinez, Sang
23 Young A. Brodie, Trevor J. Foster, and Victor C. Chan. In addition, James Tornes and Andrew
24 Wolfe may attend on behalf of TVI.

25 Jared Taylor will act as interpreter.

26 The proceedings will be recorded by Christopher Sheppard Hanlon, Lee Anthony Bowry,
27 Peter Wai Kwong Au, Jeffrey Marc Menton, Randell Buckler, Deborah Marshall, Jodi Harmon,
28 Lawrence Paul Nelson, Melanie Louise Giamarco, Tracey LoCastro and/or Randi Birnhak with
American Realtime Court Reporters & Videographers. Please cause the testimony of said
witnesses to be recorded by video and reduced to writing; the depositions to be signed by said
witnesses; said deposition testimony to be annexed to your Commission and closed under your
seal; and the return of these materials to this Court with all convenient speed.

1 WITNESS, the Honorable Howard R. Lloyd, United States Magistrate Judge of the United States
2 District Court, Northern District of California, this 31 day of August 2011.

3
4 
5 Honorable Howard R. Lloyd
6 United States Magistrate Judge
7 United States District Court
8 Northern District of California
9 San Jose Courthouse, Courtroom 2 – 5th Floor
10 280 South 1st Street
11 San Jose, CA 95113

8 I hereby certify that the signature above is that of the Honorable Howard R. Lloyd, United States
9 Magistrate Judge of the United States District Court, Northern District of California.

10 _____ Clerk of the Court.

11 By: _____

12 Deputy Clerk: _____

13 Seal:
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