

1 John C. Vetter (Admitted *Pro Hac Vice*)
FOLEY & LARDNER LLP
 EMAIL: JVETTER@FOLEY.COM
 2 One South Biscayne Boulevard, Suite 1900
 Miami, FL 33151
 3 Telephone: (305) 382-8424
 Facsimile: (305) 482-8600

4 Gina A. Bibby (State Bar No. 242657)
FOLEY & LARDNER LLP
 EMAIL: GBIBBY@FOLEY.COM
 5 975 Page Mill Road
 Palo Alto, CA 94304-1013
 6 Telephone: (650) 856-3700
 Facsimile: (650) 856-3710

7 Ary Chang (State Bar No. 244247)
FOLEY & LARDNER LLP
 EMAIL: ACHANG@FOLEY.COM
 8 3579 Valley Centre Drive, Suite 300
 San Diego, CA 92130
 9 Telephone: (858) 847-6732
 10 Facsimile: (858) 792-6773

Richard S. Florsheim (Admitted *Pro Hac Vice*)
 Cynthia J. Franecki (Admitted *Pro Hac Vice*)
FOLEY & LARDNER LLP
 EMAIL: RFLORSHEIM@FOLEY.COM
 EMAIL: CFRANECKI@FOLEY.COM
 777 E Wisconsin Avenue
 Milwaukee, WI 53202-5306
 Telephone: (414) 271-2400
 Facsimile: (414) 297-4900

11 Attorneys for Plaintiffs
 12 AVAGO TECHNOLOGIES FIBER IP (SINGAPORE) PTE. LTD.

13 Richard Allan Horning (State Bar No. 54349)
 EMAIL: RICHARD.HORNING@SNRDENTON.COM
 Dana J. Finberg (State Bar No. 257459)
 14 EMAIL: DANA.FINBERG@SNRDENTON.COM
 Imran A. Khaliq (State Bar No. 232607)
 15 EMAIL: IMRAN.KHALIQ@SNRDENTON.COM
 Matthew P. Larson (State Bar No. 266936)
 16 EMAIL: MATTHEW.LARSON@SNRDENTON.COM
SNR DENTON US LLP
 17 1530 Page Mill Road, Suite 200
 Palo Alto, CA 94304-1125
 Telephone: (650) 798-0300
 18 Facsimile: (650) 798-0310
 Attorneys for Defendants
 19 IPTRONICS, INC. AND IPTRONICS A/S

20 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 21 **SAN JOSE DIVISION**

22 AVAGO TECHNOLOGIES FIBER IP
 (SINGAPORE) PTE. LTD.,
 23 Plaintiff,
 24 v.
 25 IPTRONICS, INC. and IPTRONICS A/S,
 26 Defendants.

Case No.: 5:10-CV-02863-EJD (PSG)

**STIPULATION AND ~~PROPOSED~~ ORDER
 RE STIPULATED PROTECTIVE ORDER
 (D.I. 77), PURSUANT TO CIVIL LOCAL
 RULE 7-12**

Magistrate Judge: Honorable Paul S. Grewal

1 IT IS HEREBY STIPULATED by and among Plaintiff Avago Technologies Fiber IP
2 (Singapore) Pte. Ltd., Defendants IPtronics, Inc. and IPtronics A/S, and Third Party Reflex
3 Photonics, Inc. (“Reflex Photonics”), by and through their counsel of record as follows:

4 Section 7.1, second paragraph, first sentence of the Stipulated Protective Order (D.I. 77) at
5 lines 17-22, shall not apply to any Protected Material, as defined therein by Section 2.16, that is
6 produced, or reflected in testimony, by Reflex Photonics. All other provisions of the Stipulated
7 Protective Order (D.I. 77) shall remain in effect.

8 NOW, THEREFORE, pursuant to Civil Local Rule 7-12, the undersigned parties hereby
9 stipulate and respectfully request the Court order as follows:

10 Section 7.1, second paragraph, first sentence of the Stipulated Protective Order (D.I. 77) at
11 lines 17-22, shall not apply to any Protected Material, as defined therein by Section 2.16, that is
12 produced, or reflected in testimony, by Reflex Photonics. All other provisions of the Stipulated
13 Protective Order (D.I. 77) shall remain in effect.

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15
16 Dated: January ¹⁸~~10~~, 2012



Honorable Paul S. Grewal
United States Magistrate Judge

17
18
19 Respectfully submitted

20 Foley & Lardner LLP

21 By: /s/ John C. Vetter

22 Dated: January 10, 2012

John C. Vetter
Gina A. Bibby
ATTORNEYS FOR PLAINTIFF
AVAGO TECHNOLOGIES FIBER IP
(SINGAPORE) PTE. LTD.

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

SNR Denton LLP

Dated: January 10, 2012

By: /s/ Matthew P. Larson
Richard Allan Horning
Dana J. Finberg
Imran A. Khaliq
Matthew P. Larson
ATTORNEYS FOR DEFENDANTS
IPTRONICS, INC. AND IPTRONICS A/S

DLA Piper LLP (US)

Dated: January 10, 2012

By: /s/ Rajiv Dharnidharka
Alan Limbach
Rajiv Dharnidharka
ATTORNEYS FOR THIRD PARTY
REFLEX PHOTONICS, 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

CERTIFICATION OF CONCURRENCE

I hereby attest that concurrence in the filing of this document has been obtained from counsel for IPtronics, Inc. and IPtronics A/S, Matthew P. Larson, and counsel for Reflex Photonics, Inc., Rajiv Dharnidharka.

Dated: January 10, 2012

Foley & Lardner LLP

By: /s/ Gina A. Bibby
Gina A. Bibby
Attorneys for Plaintiff Avago Technologies Fiber IP
(Singapore) Pte. Ltd.