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Attorneys for Plaintiffs

AVAGO TECHNOLOGIES U.S. INC., AVAGO TECHNOLOGIES GENERAL IP

(SINGAPORE) PTE. LTD., AVAGO TECHNOLOGIES TRADING LTD., AND

AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LTD.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN JOSE DIVISION**

AVAGO TECHNOLOGIES U.S. INC.,  
AVAGO TECHNOLOGIES GENERAL IP  
(SINGAPORE) PTE. LTD., AVAGO  
TECHNOLOGIES TRADING LTD., AND  
AVAGO TECHNOLOGIES  
INTERNATIONAL SALES PTE. LTD.,

Plaintiffs,

v.

IPTRONICS INC., MELLANOX  
TECHNOLOGIES DENMARK APS,  
MELLANOX TECHNOLOGIES, INC., and  
MELLANOX TECHNOLOGIES, LTD.,

Defendants.

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

**SUPPLEMENTAL REQUEST FOR  
INTERNATIONAL JUDICIAL ASSISTANCE  
PURSUANT TO THE HAGUE CONVENTION OF  
18 MARCH 1970 ON THE TAKING OF  
EVIDENCE ABROAD IN CIVIL OR  
COMMERCIAL MATTERS**

**SUPPLEMENTAL REQUEST FOR INT'L JUDICIAL ASSISTANCE PURSUANT TO THE  
HAGUE CONVENTION OF 18 MARCH 1970 ON THE TAKING OF EVIDENCE ABROAD**  
CASE NO. 5:10-CV-02863-EJD (PSG)

1       **1. Sender**

2           The Honorable Paul S. Grewal  
3           United States Magistrate Judge  
4           United States District Court for the Northern District of California  
5           San Jose Division  
6           280 South 1<sup>st</sup> Street  
7           San Jose, CA 95113  
8           United States of America

9       **2. Central Authority of the Requested State**

10          Ministère de la Justice  
11          13 Place Vendôme  
12          75042 Paris Cedex 01  
13          FRANCE

14       **3. Person to Whom the Executed Request is to be Returned**

15          Alexandra Neri  
16          Partner-IP/TMT Department  
17          Herbert Smith Freehills Paris LLP  
18          66 avenue Marceau  
19          75008 PARIS  
20          T: +33 (0)1 53 57 78 30  
21          F: +33 (0)1 53 57 70 80  
22          Alexandra.Neri@hsf.com

23       **4. Specification of the Date by Which the Requesting Authority Requires Receipt of the  
24       Response to the Letter Request**

25          As soon as reasonably practicable.

26       **IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED  
27       APPLICANT HAS THE HONOR TO SUBMIT THE FOLLOWING SUPPLEMENTAL  
28       REQUEST:**

1       **5. a.       Requesting Judicial Authority (Art. 3(a))**

2           United States District Court for the Northern District of California  
3           San Jose Division  
4           280 South 1<sup>st</sup> Street  
5           San Jose, CA 95113  
6           United States of America

7       **b.       To the Competent Authority of (Art. 3(a))**

8          The Central Authority of France

**c. Name of the Case and Any Identifying Number**

*Avago Technologies Fiber IP (Singapore) Pte. Ltd., et al. v. IPtronics, Inc. and IPtronics A/S;*  
Case Number 5:10-CV-02863 EJD (PSG), United States District Court for the Northern District of  
California.

## 6. Clarification of Initial Letter of Request

On July 21, 2015, the Court granted Avago’s Application for Request for International Judicial Assistance (the “Application”) (Dkt. No. 636) and executed Avago’s Letter Request to the Central Authority of France. The undersigned Judicial Authority has been informed that, on or about July 28, 2015, the Central Authority indicated that it would prefer that the Judicial Authority nominate a specific commissioner for appointment to preside over the taking of evidence in France pursuant to the Letter Request. Accordingly, the undersigned Judicial Authority hereby nominates the following person for the position of commissioner in the above-cited case:


Ms. Sylvie Mandel,  
*Conseiller honoraire* at the *Cour de cassation* [French Supreme Court]  
 Residing at: 47 rue Saint André des Arts Paris 75007  
 Telephone: +33146331880

In this capacity, Ms. Sylvie Mandel would have broad powers to undertake the measures that have previously been defined under the conditions set forth in points 10 to 17 of the letter rogatory dated of the 21 July 2015; no changes are made to any of the other points.

The examination will take place at the offices of Herbert Smith Freehills Paris – 66 avenue Marceau Paris 75008.

Date of Request: August 5, 2015

Signature and Seal of  
Requesting Authority

  
Honorable Paul S. Grewal  
U.S. Magistrate Judge