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2 of Alston & Bird, all full, complete hierarchical netlists for the accused products (except for
3 transistor model information from STMicro) in the possession custody or control of defendants
4 in standard SPICE or SPECTRE modeling format, as .scs or other text-format native files. If
5 Defendants' production occurs after September 4th, then Avago and Defendants stipulate that the
6 deadline for Avago's technical experts to serve their reports addressing the accused products
7 should be extended by that same number of days, and the parties stipulate that they shall seek
8 such leave from the Court by stipulation. Defendants will load these files onto a computer
9 provided by Avago, onto which Avago will have loaded software to perform simulation and
10 modeling of the accused products. Avago's technical expert, Mr. Peterson, will then use this
11 Avago-provided computer to perform modeling and simulation analyses using the netlists. Mr.
12 Peterson will be permitted to load additional software onto the Avago-provided computer after it
13 has been provided to Alston & Bird, should he desire to do so. Mr. Peterson will be permitted to
14 create .pdf files reflecting his simulation and modeling analyses and their results, but not the net
15 lists themselves. Defendants' counsel will transfer those .pdf files to a portable memory drive
16 that will be provided to Mr. Peterson before he leaves the inspection facility that day. These .pdf
17 files will be retained by Mr. Peterson and can be removed from the inspection facility, and will
18 be retained as Highly Confidential information in accordance with the Protective Order. The
19 existing computer containing the documents that Defendants have previously presented for
20 inspection will also be available to Mr. Peterson for his continued inspection simultaneous with,
21 and in the same room at Alston & Bird as, his simulation and modeling analyses described
22 above.

- 23 2. The parties agree that Avago's counsel and experts will be permitted to continue to inspect the
24 documents Defendants have previously presented for inspection, and the documents described
25 above, and to perform the simulation and modeling work described above, throughout the period
26 ending two weeks after the deposition of Defendants' technical expert or experts who opine on
27 infringement, or two weeks after the close of expert discovery, whichever is sooner. At the
28 conclusion of this period, Defendants shall retain custody of the Avago-provided computer and

1 retain all data stored thereon, through trial and any appeal, but Defendants shall not use the
2 modeling and simulation software installed on that computer by Avago.

- 3 3. Avago also seeks from Defendants the production of circuit-component device models in a
4 conventional format (BSIM 3v3 if available, for the MOS models; HICUM models if available
5 for the bipolar devices), in native format, and in conventional format (SPICE if available, for
6 diode models, etc.). Defendants contend that they cannot produce this information, absent
7 STMicro's consent, which STMicro has refused to provide, or a court order. The parties wish to
8 present this issue to the Court this afternoon.

9 **NOW, THEREFORE**, the Parties, after conferring, hereby stipulate to, and jointly request that
10 the Court order the relief specified above.

11
12 Respectfully submitted,

13 Dated: September 1, 2015

FOLEY & LARDNER LLP

14
15 By: /s/ Richard S. Florsheim
16 Richard S. Florsheim

17 ATTORNEYS FOR PLAINTIFFS
18 Avago Technologies U.S. Inc., Avago
19 Technologies General IP (Singapore) Pte. Ltd.,
20 Avago Technologies Trading Ltd., and Avago
Technologies International Sales Pte. Ltd

21 Dated: September 1, 2015

22 ALSTON & BIRD

23
24 By: /s/ Michael S. Connor
Michael S. Connor

25 ATTORNEYS FOR DEFENDANTS
26 Mellanox Technologies Denmark ApS, IPtronics,
27 Inc., Mellanox Technologies, Ltd. and Mellanox
28 Technologies, Inc.

DECLARATION OF CONSENT

The undersigned filer attests, pursuant to Civil Local Rule 5-1(i)(3), that the concurrence in the filing of the document has been obtained from the other signatories to this document.

Dated: September 1, 2015

By: /s/ Richard S. Florsheim
Richard S. Florsheim


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ORDER

Pursuant to the Stipulation, and GOOD CAUSE APPEARING,

IT IS SO ORDERED.

Date: September 24, 2015



Hon. Paul S. Grewal
United States Magistrate Judge

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on September 1, 2015, to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system per Civil Local Rule 5.1.

By: /s/ Richard S. Florsheim
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