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12 Attorneys for Defendant
 13 YOUTUBE, LLC

14 Additional Counsel Listed on the Signature Pages

15 **UNITED STATES DISTRICT COURT**
 16 **NORTHERN DISTRICT OF CALIFORNIA**
 17 **SAN JOSE DIVISION**

18 PRAGMATUS AV, LLC,
 19 Plaintiff,
 20 v.
 21 FACEBOOK, INC., YOUTUBE, LLC,
 22 LINKEDIN CORPORATION, and
 23 PHOTOBUCKET.COM, INC.,
 24 Defendants.

) CASE NO.: C11-00494-EJD
) ~~PROPOSED~~
) **ORDER AND STIPULATION**
) **EXTENDING BRIEFING SCHEDULE**
) **FOR DEFENDANTS' MOTION TO**
) **STAY CASE PENDING ORDER IN**
) **INTER PARTES REEXAMINATION OF**
) **PATENTS-IN-SUIT**
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1 WHEREAS, Defendant YouTube, LLC (“YouTube”) filed a Request for *Inter Partes*
2 Reexamination (“Reexamination Request”) with the Patent and Trademark Office (“PTO”) for the
3 patents-in-suit on June 8, 2011;

4 WHEREAS, on June 17, 2011, Defendants moved this Court to stay the case pending
5 reexamination (*see* “Motion to Stay,” Dkt. No. 125);

6 WHEREAS, on June 20, 2011, Defendants also filed an Administrative Motion requesting
7 an earlier hearing date on its motion to stay (Dkt. No. 127);

8 WHEREAS, a case management conference was held on June 29, 2011, before the
9 Honorable Edward J. Davila;

10 WHEREAS, following the case management conference, the Court advanced the Hearing
11 on the Motion to Stay to September 15, 2011 (Dkt. No. 135);

12 WHEREAS, the Court further set the deadline for Plaintiff to file a brief in opposition to
13 Defendants’ Motion to Stay for August 12, 2011 (Dkt. No. 135);

14 WHEREAS, the PTO has not yet issued an order on the pending reexamination requests
15 for the patents-in-suit; and

16 WHEREAS, the parties have agreed to extend the briefing schedule so the deadline for
17 Plaintiff’s opposition to Defendants’ Motion to Stay is the earlier of seven days after Plaintiff
18 receives any order issued by the PTO on the Reexamination Requests or August 25.

19 IT IS HEREBY STIPULATED by and between the parties, through their respective
20 counsel undersigned, that:

21 The deadline for Plaintiff to file its opposition to Defendants’ Motion to Stay is the
22 earlier of seven days after Plaintiff receives any order issued by the PTO on the Reexamination
23 Requests or August 25.

1 Dated: August 11, 2011

2 REED SMITH LLP

COOLEY LLP

3 By /s/ David T. Pollock

By /s/ Heidi L. Keefe

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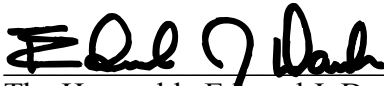
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Attorneys for Defendant
PHOTOBUCKET.COM, INC.

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 DATED: August 12, 2011


The Honorable Edward J. Davila

1 ATTESTATION CLAUSE

2 I, Stefani E. Shanberg, am the ECF User whose identification and password are being
3 used to file this Stipulation Extending Briefing Schedule for Defendants’ Motion to Stay Case
4 Pending Order in *Inter Partes* Reexamination of Patents-in-Suit. In compliance with General
5 Order 45.X.B., I hereby attest that David T. Pollock of Reed Smith LLP, Heidi L. Keefe of
6 Cooley LLP, Daralyn J. Durie of Durie Tangri LLP, and Dan D. Davison of Fulbright &
7 Jaworski LLP have concurred in this filing.
8

9 Dated: August 11, 2011

10 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

11 By: /s/ Stefani E. Shanberg
12 Stefani E. Shanberg

13 Attorneys for Defendant
14 YOUTUBE, LLC
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