

SHARTSIS FRIESE LLP  
ONE MARITIME PLAZA  
EIGHTEENTH FLOOR  
SAN FRANCISCO, CA 94111-3598

1 SHARTSIS FRIESE LLP  
2 ARTHUR J. SHARTSIS (Bar #51549)  
3 ashartsis@sflaw.com  
4 MARY JO SHARTSIS (Bar #55194)  
5 mshartsis@sflaw.com  
6 ROBERT E. SCHABERG (Bar #81430)  
7 rschaberg@sflaw.com  
8 LARISA A. MEISENHEIMER (Bar #228777)  
9 lmeisenheimer@sflaw.com  
10 JOHN J. STEIN (Bar #253777)  
11 jstein@sflaw.com  
12 One Maritime Plaza, Eighteenth Floor  
13 San Francisco, CA 94111-3598  
14 Telephone: (415) 421-6500  
15 Facsimile: (415) 421-2922  
16  
17 Attorneys for Plaintiff  
18 GSI TECHNOLOGY, INC.  
19

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

25 GSI TECHNOLOGY, INC., a Delaware  
26 corporation,  
27  
28 Plaintiff,  
v.  
CYPRESS SEMICONDUCTOR  
CORPORATION, a Delaware corporation,  
Defendant.

Case No. 5:11-cv-03613-EJD

**STIPULATION AND [PROPOSED]  
ORDER REGARDING ~~SIXTY~~  
REOPENING OF DISCOVERY AND  
MODIFICATION OF DISPOSITIVE  
MOTION BRIEFING SCHEDULE  
(AMENDED)**

Plaintiff GSI Technology, Inc. (“GSI”) and Defendant Cypress Semiconductor Corporation (“Cypress”), by and through their respective counsel of record, hereby agree and stipulate to the following:

1. On April 25, 2014, the Court approved the Parties’ Stipulation Regarding Limited Reopening of Discovery and Modification of Dispositive Motion Briefing Schedule and Order [ECF 70]. The Court’s April 25, 2014 Order provided for the completion of certain depositions on or before May 23, 2014. One necessary GSI witness is unavailable until June and that

1 witness's deposition may impact Cypress's decision to exercise its right under the Court's April  
2 25, 2014 Order to take one additional deposition of a GSI witness. Accordingly, the Parties  
3 hereby request the following revision to the deposition schedule:

4 (a) All depositions shall be complete on or before June 13, 2014.

5 3. Under the current briefing schedule, dispositive motions must be filed no later  
6 than May 30, 2014, oppositions shall be filed by July 7, 2014, and reply memoranda shall be  
7 filed by August 4, 2014. The hearing date is set for September 5, 2014 at 9:00 AM. The Parties  
8 jointly request that the Court approve and adopt the following modified briefing schedule so that  
9 dispositive motions are due after the completion of depositions:

10 (a) Dispositive motions and any motions pursuant to *Daubert v. Merrell Dow*  
11 *Pharmaceuticals*, 509 U.S. 579 (1993), shall be filed and served no later than June 20, 2014;

12 (b) Memoranda in Opposition shall be filed and served no later than July 28, 2014;

13 (c) Reply Memoranda shall be filed no later than August 25, 2014; and

14 (d) The hearing date shall remain as set for September 5, 2014 at 9:00 AM.

15 IT IS SO STIPULATED.

16 Respectfully submitted,

17 DATED: May 9, 2014

SHARTSIS FRIESE LLP

18 By: /s/ Robert E. Schaberg

19 Arthur J. Shartsis (SBN 51549)  
20 Mary Jo Shartsis (SBN 55194)  
21 Robert E. Schaberg (SBN 81430)  
22 Larisa A. Meisenheimer (SBN 228777)  
23 John J. Stein (SBN 253777)

Attorneys for Plaintiff  
GSI TECHNOLOGY, INC.

24 DATED: May 9, 2014

MAYER BROWN LLP

25 By: /s/ Lee H. Rubin

26 Lee H. Rubin (SBN 141331)  
27 Christopher J. Kelly (SBN 276312)

Attorneys for Defendant  
CYPRESS SEMICONDUCTOR  
CORPORATION

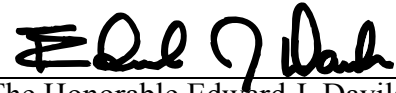
SHARTSIS FRIESE LLP  
ONE MARITIME PLAZA  
EIGHTEENTH FLOOR  
SAN FRANCISCO, CA 94111-3598

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

**ATTESTATION:** The Filer attests that concurrence in the filing of this document has been obtained from all signatories.

Pursuant to stipulation, IT IS SO ORDERED AS MODIFIED.

Dated: May 13, 2014



\_\_\_\_\_  
The Honorable Edward J. Davila  
United States District Court

08301\001\4517619.v1