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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN JOSE DIVISION

12 GUZIK TECHNICAL ENTERPRISES,
 13 INC.,

14 Plaintiff,

15 v.

16 WESTERN DIGITAL
 17 CORPORATION, WESTERN
 18 DIGITAL TECHNOLOGIES, INC.,
 19 WESTERN DIGITAL (FREMONT)
 20 INC., WESTERN DIGITAL
 21 (THAILAND) COMPANY LIMITED,
 22 WESTERN DIGITAL (MALAYSIA)
 23 SDN.BHD,

24 Defendants.

No. 5:11-cv-03786-PSG

**STIPULATION AND
 ORDER TO EXTEND TIME TO
 ANSWER OR OTHERWISE RESPOND
 TO COMPLAINT AND TO CONTINUE
 RELATED DATES**

1 Pursuant to Civil Local Rules 6-2, 7-12, and related rules, Plaintiff Guzik Technical
2 Enterprises, Inc. (“GTE”) and Defendants Western Digital Corporation, Western Digital
3 Technologies, Inc., Western Digital (Fremont) Inc., Western Digital (Thailand) Company
4 Limited, and Western Digital (Malaysia) SDN.BHD (collectively, “Western Digital
5 Defendants”), hereby stipulate through their respective counsel of record as follows:

6 WHEREAS, on August 1, 2011, GTE filed its Complaint against the Western Digital
7 Defendants;

8 WHEREAS, GTE asserts that it served its Complaint upon Defendant Western Digital
9 Corporation on August 3, 2011;

10 WHEREAS, GTE asserts that it served its Complaint upon Defendant Western Digital
11 (Thailand) Company Limited on August 3, 2011;

12 WHEREAS, GTE asserts that it served its Complaint upon Defendant Western Digital
13 Technologies, Inc. on August 3, 2011;

14 WHEREAS, GTE asserts that it served its Complaint upon Defendant Western Digital
15 (Malaysia) SDN.BHD on August 3, 2011;

16 WHEREAS, GTE asserts that it served its Complaint upon Defendant Western Digital
17 (Fremont) Inc. on August 5, 2011;

18 WHEREAS, based on the foregoing, the answer or other response to the Complaint for
19 the earliest-served Western Digital Defendants was initially due on or before August 24, 2011;

20 WHEREAS, on August 1, 2011, the Court issued an Order Setting Initial Case
21 Management Conference and ADR Deadlines (Dkt. No. 8) which, among other provisions, set an
22 Initial Case Management Conference in the above-specified action on October 18, 2011, and
23 specified related deadlines leading up to that conference;

24 WHEREAS, GTE and Western Digital, through their respective counsel of record, have
25 agreed to extend the time by which Western Digital must answer or otherwise respond to the
26 Complaint, and to seek a corresponding continuance of the dates that have already been set by
27 the Court;

1 WHEREAS, Western Digital's undersigned counsel hereby declares that the extensions
2 requested herein are necessary to provide the Western Digital Defendants sufficient time to
3 analyze the allegations set forth in the Complaint, retain counsel and formulate their responses to
4 the Complaint; and

5 WHEREAS, the parties' undersigned counsel hereby declare and disclose that no
6 previous time modifications have been sought or obtained in the above-entitled action, and that
7 the time modifications requested herein would have no material impact on the case schedule
8 because the case is at its initial stage:

9 IT IS HEREBY STIPULATED by and between the parties hereto through their
10 respective attorneys of record that:

- 11 (1) The Western Digital Defendants shall have until September 26, 2011 to file a
12 response to the Complaint;
- 13 (2) The Initial Case Management Conference will be continued from October 18,
14 2011 to November 15, 2011, in Courtroom 5, 4th Floor, San Jose Courthouse, at
15 2:00 p.m., and all other dates will be continued accordingly.

16
17 Dated: August 11, 2011

Respectfully submitted,

18 **BARCELO, HARRISON & WALKER, LLP**

19
20 By: /s/ Reynaldo C. Barceló

21 Reynaldo C. Barceló

22 ATTORNEY FOR DEFENDANTS
23 WESTERN DIGITAL CORPORATION,
24 WESTERN DIGITAL TECHNOLOGIES,
25 INC., WESTERN DIGITAL (FREMONT)
26 INC., WESTERN DIGITAL (THAILAND)
27 COMPANY LIMITED, AND WESTERN
28 DIGITAL (MALAYSIA) SDN.BHD

1 Dated: August 11, 2011

Respectfully submitted,

2 **BERGESON, LLP**

3
4 By: /s/ Jaideep Venkatesan

5 Jaideep Venkatesan

6 ATTORNEY FOR PLAINTIFF GUZIK
7 TECHNICAL ENTERPRISES, INC.

8
9 I hereby attest pursuant to General Order 45.X.B that concurrence in the electronic filing of
10 this document has been obtained from the other signatories.

11 Dated: August 11, 2011

 /s/ Reynaldo C. Barceló

12 Reynaldo C. Barceló

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14
15 PURSUANT TO STIPULATION, IT IS SO ORDERED

16
17
18 Dated: August 12, 2011

 Paul S. Grewal

19 HONORABLE PAUL S. GREWAL
20 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that all counsel of record who are deemed to have
3 consented to electronic service are being served with a copy of this document via the Court's
4 ECF System.

5 Dated: August 11, 2011

_____ /s/ *Reynaldo C. Barceló*

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