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13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION  
 16

17 GUZIK TECHNICAL ENTERPRISES, INC.

18 Plaintiff and Counterclaim Defendant,

19 v.

20 WESTERN DIGITAL CORPORATION,  
 WESTERN DIGITAL TECHNOLOGIES, INC.,  
 21 and WESTERN DIGITAL (FREMONT) INC.,

22 Defendants and Counterclaim Plaintiffs, and

23 WESTERN DIGITAL (THAILAND) COMPANY  
 LIMITED and WESTERN DIGITAL  
 24 (MALAYSIA) SDN.BHD,

25 Defendants.  
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CASE NO. 5:11-CV-03786-PSG

**STIPULATION AND ~~PROPOSED~~  
 ORDER EXTENDING TIME FOR  
 FILING OF STIPULATED  
 PROTECTIVE ORDER OR MOTIONS  
 FOR PROTECTIVE ORDER**

1 Plaintiff Guzik Technical Enterprises, Inc. (“GTE”) and Defendants Western Digital  
2 Corporation, Western Digital Technologies, Inc., Western Digital (Fremont), LLC, Western  
3 Digital (Thailand) Company Limited, and Western Digital (Malaysia) Sdn.Bhn. (collectively,  
4 “Western Digital”) hereby stipulate through their respective counsel of record as follows:

5 WHEREAS, on August 1, 2011, GTE filed its Complaint against Western Digital;

6 WHEREAS, on August 1, 2011, the Court issued an Order Setting Initial Case  
7 Management Conference and ADR Deadlines (Dkt. No. 8) setting an Initial Case Management  
8 Conference in this matter on October 18, 2011;

9 WHEREAS, the Court ordered, pursuant to the Parties’ stipulation, that Western Digital  
10 would have until September 26, 2011 to file a response to the complaint and that the Initial Case  
11 Management Conference be continued from October 18, 2011 to November 15, 2011 that all  
12 other associated dates would be continued (Dkt. No. 13);

13 WHEREAS, the Court ordered, pursuant to the Parties’ stipulation, that GTE would have  
14 until November 16, 2011 to file a response to Western Digital’s Counterclaims and that the  
15 Initial Case Management Conference be continued from November 15, 2011 to December 13,  
16 2011 and that all other associated dates would be continued (Dkt. No. 34);

17 WHEREAS, the Court ordered, pursuant to the Parties’ stipulation, that the Initial Case  
18 Management Conference be continued from December 13, 2011 to December 16, 2011, but that  
19 all other dates would be unchanged (Dkt. No. 53);

20 WHEREAS, on December 6, 2011, Western Digital and GTE filed a Joint Case  
21 Management Statement and [Proposed] Order (Dkt. No. 50), which included a deadline of  
22 December 20, 2011 for filing a proposed protective order or motion for protective order to  
23 govern confidential material in this case;

24 WHEREAS, the parties have diligently discussed and negotiated the terms of a stipulated  
25 protective order, but have not yet reached agreement on all terms;

26 WHEREAS, Western Digital and GTE believe that outstanding issues concerning the  
27 terms of a stipulated protective order can be resolved or substantially narrowed given additional  
28 time to meet and confer;

1           WHEREAS, Western Digital and GTE have agreed, subject to the Court's approval, to  
2 extend the deadline for submitting a stipulated protective order or motion for protective order  
3 until and including January 13, 2012;

4           WHEREAS, the parties' undersigned counsel confirm that the requested time  
5 modification would have no material impact on the case schedule because the case is at its initial  
6 stage:

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

9           The time for filing a stipulated protective order or motion for protective order to govern  
10 confidential material in this matter will be extended from December 20, 2011 to January 13,  
11 2012.

13 Dated: December 19, 2011

LATHAM & WATKINS, LLP

15 By: /s/ James L. Day

James L. Day

16 Attorneys for Defendants/Counterclaim Plaintiffs  
Western Digital Corporation et al.

18           In accordance with General Order No. 45, Rule X, the above signatory attests that  
19 concurrence in the filing of this document has been obtained from the signatory below.

21 Dated: December 19, 2011

BERGESON, LLP

23 By: /s/ Melinda M. Morton

Melinda M. Morton

24 Attorneys for Plaintiff/Counterclaim Defendant  
Guzik Technical Enterprises, Inc.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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3 Dated: \_December 20\_, 2011

*Paul S. Grewal*

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HON. PAUL SINGH GREWAL  
UNITED STATES MAGISTRATE JUDGE

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