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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.

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

**STIPULATION AND ~~PROPOSED~~
 ORDER ENLARGING TIME FOR
 CERTAIN CLAIM CONSTRUCTION
 DEADLINES**

Magistrate Judge: Hon. Paul Singh Grewal
 Courtroom: 5, 4th Floor

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Pursuant to Civil Local Rules 6-1, 6-2, 7-12, and related rules, Plaintiff Guzik Technical Enterprises, Inc. (“GTE”) and Defendants Western Digital Corporation et al. (collectively, “Western Digital”) respectfully request that the Court enter the following stipulation regarding the schedule set forth in the December 19, 2011 Case Management Order (Dkt. 57) and the Stipulation Enlarging Time For Invalidity Contentions and Certain Claim Construction Deadlines entered March 16, 2012 (Dkt. 71). The parties now AGREE AND STIPULATE to extend the following deadlines:

Event	Previous Deadline	Proposed Deadline
Last Day for Exchange of Preliminary Proposed Claim Construction and Extrinsic Evidence (Patent L.R. 4-2)	May 14, 2012	May 25, 2012
Last Day for Filing Joint Claim Construction and Prehearing Chart (Pat. L.R. 4.3)	June 1, 2012	June 8, 2012

1. Reason for the Request

Both GTE and Western Digital have asserted patent claims in this case. Between the parties there are six patents in play with 83 claims asserted. The parties believe both parties will benefit from an additional eleven days to prepare their Disclosures of Preliminary Proposed Claim Constructions. The parties have adjusted the subsequent claim construction exchange accordingly. No other deadlines, including the claim construction briefing and hearing schedule, are affected by this stipulation.

2. Prior Time Modifications

The time for Western Digital to respond to GTE’s Complaint was previously extended from August 24, 2011 to September 26, 2011. The Initial Case Management Conference was continued from October 18, 2011 to November 15, 2011, and then further continued to December 13, 2011. The time for GTE to respond to Western Digital’s Counterclaims was previously extended from October 17, 2011 to November 16, 2011. The hearing on Western Digital’s Motion to Dismiss was previously continued from November 1, 2011 to November 8, 2011 and then further continued to November 15, 2011. The time for the parties to file a

1 stipulated protective order was previously extended from December 20, 2011 to January 13,
2 2012. The hearing on GTE's Motion to Dismiss was previously continued from January 10,
3 2012 to January 24, 2012, and further continued to January 31, 2012. The date for service of
4 invalidity contentions was previously extended from April 2, 2012 to April 13, 2012. The date
5 for the exchange of Patent L.R. 4-1 disclosures was previously extended from April 16, 2012 to
6 April 25, 2012. The date for the exchange of Patent L.R. 4-2 disclosures was previously
7 extended from May 7, 2012 to May 14, 2012.

8 3. Effect of Requested Modification

9 These extensions currently under discussion will have no effect on the dates for claim
10 construction briefing or any subsequent deadlines in this case.

11 So Stipulated.

12 Dated: May 7, 2012

LATHAM & WATKINS, LLP

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14 By: /s/ Richard G. Frenkel

Richard G. Frenkel

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

17 Pursuant to General Order 45.X.B, I hereby attest that concurrence in the electronic filing
18 of this document has been obtained from the other signatories.

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20 Dated: May 7, 2012

BERGESON, LLP

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22 By: /s/ Jaideep Venkatesan

Jaideep Venkatesan

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

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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27 Dated: May



UNITED STATES MAGISTRATE JUDGE

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