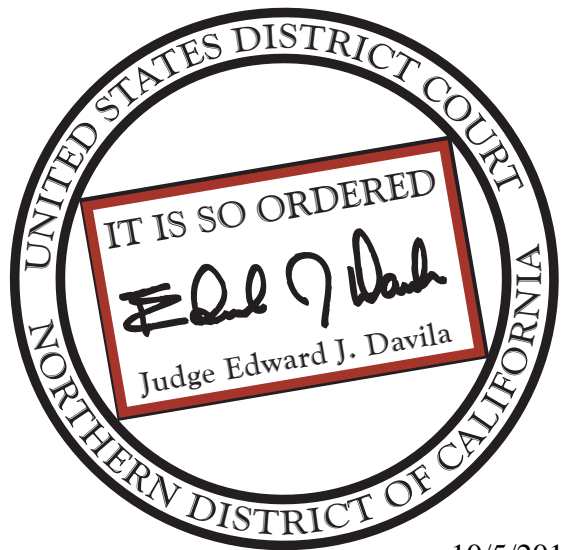


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10/5/2012

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

29 TESSERA, INC., A DELAWARE CORPORATION.
 30
 31 PLAINTIFF,
 32
 33 vs.
 34 SONY CORPORATION, A JAPANESE
 35 CORPORATION,
 36
 37 DEFENDANT.

) CASE No: 5:11-CV-04399-EJD (HRL)
)
) **STIPULATED REQUEST FOR**
) **ENLARGEMENT OF TIME TO TAKE**
) **THIRD PARTY DEPOSITIONS AND TO**
) **EXTEND EXPERT DISCOVERY DATES**
) **PURSUANT TO CIVIL L.R. 6-2**
)
) Judge: Hon. Edward J. Davila
) Mag. Judge: Hon. Howard R. Lloyd
)
)
)
)

1 Pursuant to Civil Local Rule 6-2, Defendant Sony Corporation (“Sony”) and Plaintiff
2 Tessera, Inc. (“Tessera”) (collectively, “the Parties”), hereby stipulate and agree to the following
3 request for enlargement of time pursuant to Civil L.R. 6-2.

4 The parties respectfully request an Order granting leave to take depositions of third
5 parties Connor Group NV, LLC, Nigel Shepherd, and Edgar Ooms by November 21, 2012.
6 Sony has served deposition subpoenas on Connor Group NV, LLC, Nigel Shepherd and Edgar
7 Ooms. (See Moore Decl. ¶ 2.) Connor Group NV, LLC and Mr. Shepherd reside in Reno,
8 Nevada, while Mr. Ooms resides in Rainier, Washington. (See Moore Decl. ¶¶ 3 and 4.) The
9 Parties have been informed that, due to their international travel schedules, these deponents will
10 not be available for deposition on the dates noticed or prior to the October 19, 2012 close of fact
11 discovery (see Dkt. No. 30 at 2), but that they will be available on or before November 21, 2012.
12 (See Moore Decl. ¶ 5.) The parties do not seek an extension of fact discovery other than to
13 complete these depositions.

14 The Parties additionally request an enlargement of time concerning expert discovery,
15 pursuant to the schedule set forth below. The deadline for opening expert reports is currently set
16 for November 9, 2012. See Dkt. No. 30 at 2. Since the depositions of Connor Group, Mr.
17 Shepherd, and Mr. Ooms will not occur until mid-November, the Parties additionally request that
18 the Court extend the deadlines for exchanging expert reports and subsequent expert discovery.
19 The parties have stipulated to the following revised schedule for expert discovery deadlines:

EVENT	PREVIOUS DEADLINE	PROPOSED NEW DEADLINE
Designation of Opening Experts with Reports	November 9, 2012	December 5, 2012
Designation of Rebuttal Experts with Reports	November 30, 2012	December 21, 2012
Expert Discovery Cutoff	December 21, 2012	January 9, 2013

25 Pursuant to the requirements of Civil L.R. 6-2, an accompanying declaration of Aaron
26 Moore “Moore Decl.” has been filed concurrently herewith.

1 Adopting these proposed new deadlines would not alter the currently scheduled deadline
2 for filing of dispositive motions on January 11, 2013, nor would it alter the currently scheduled
3 deadline for a Joint Pretrial Statement on February 12, 2013. *See* Dkt. No. 30 at 2. *See* Moore
4 Decl. ¶ 8.

5 **CONCLUSION**

6 Accordingly, the Parties respectfully request that the Court enlarge the time to take the
7 third-party depositions of Connor Group NV, LLC, Nigel Shepherd, and Edgar Ooms, and that
8 the Court further extend the deadlines for expert discovery pursuant to the schedule set forth
9 above.

10 **ENDORSEMENT PER CIVIL L.R. 7-12**

11
12 PUSUANT TO STIPULATION, IT IS SO ORDERED

13
14 Dated: 10/5/2012

15 
16 _____
17 Hon. Edward J. Davila
18 United States District Court Judge
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Dated: October 3, 2012

FOLEY & LARDNER LLP
Matthew B. Lowrie
Eileen R. Ridley
Aaron W. Moore
Ruben J. Rodrigues

By: /s/ Aaron W. Moore
Aaron W. Moore

Attorneys For Defendant Sony Corp.

Dated: October 3, 2012

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Lisa S. Glasser
Richard W. Krebs

By: /s/ Richard W. Krebs
Richard W. Krebs

Attorneys for Plaintiff Tessera, Inc.

ATTESTATION OF CONCURRENCE IN FILING

Pursuant to Civil L.R. 5-1(i)(3), I, Aaron W. Moore, hereby attest that concurrence in the filing of this Stipulated Request for Enlargement of time has been obtained from Melissa R. McCormick, counsel for Tessera.

Dated: October 3, 2012

By: /s/Aaron W. Moore
Aaron W. Moore

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October 2012, a copy of the foregoing was filed electronically through the Court's CM/ECF system, with notice of case activity automatically generated and sent electronically to all parties.

DATE: OCTOBER 3, 2012

By: /s/ Ruben J. Rodrigues
RUBEN J. RODRIGUES