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18 IN THE UNITED STATES DISTRICT COURT
 19 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 20 SAN JOSE DIVISION

21 COMPRESSION TECHNOLOGY
 22 SOLUTIONS LLC,
 23
 24 Plaintiff,
 25
 26 v.
 27
 28 EMC CORPORATION, NETAPP, INC., AND
 QUANTUM CORP.,
 Defendants.

Case No. 5:12-cv-01746-RMW

**STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND TIME FOR INVALIDITY
 CONTENTIONS AND DOCUMENTS
 ACCOMPANYING INVALIDITY
 CONTENTIONS**

Ctrm: Courtroom 6 - 4th Floor
 Judge: Honorable Ronald M. Whyte

1 WHEREAS the Court issued a Scheduling Order on October 11, 2012 setting the dates
2 for discovery deadlines;

3 WHEREAS the current deadline for service of Invalidity Contentions and production of
4 Documents Accompanying Invalidity Contentions pursuant to Patent L.Rs. 3-3 and 3-4 is
5 November 26, 2012;

6 WHEREAS on September 17, 2012 the Defendants filed a motion for summary judgment
7 of invalidity;

8 WHEREAS on October 19, 2012 the Plaintiff filed a motion to stay the November 2,
9 2012 hearing on Defendants' motion for summary judgment;

10 WHEREAS on November 2, 2012 the Court heard oral arguments on Defendants' motion
11 for summary judgment and Plaintiff's motion to stay; and

12 WHEREAS the parties have stipulated, pursuant to Civil L.R. 6-2, to extend the time for
13 Defendants to serve Invalidity Contentions pursuant to Patent L.R. 3-3 and to produce
14 Documents Accompanying Invalidity Contentions pursuant to Patent L.R. 3-4 until 20 days after
15 the Court issues its ruling on Defendants' motion for summary judgment of invalidity;

16 NOW, THEREFORE, the parties hereby STIPULATE AND AGREE, and request the
17 Court to order, as follows:

18 The deadline for Defendants to serve Invalidity Contentions and produce Documents
19 Accompanying Invalidity Contentions, pursuant to Patent L.Rs. 3-3 and 3-4, shall be stayed until
20 20 days after the Court's ruling on Defendants' motion for summary judgment of invalidity. All
21 dates following the disclosure of Invalidity Contentions shall be stayed pending adjudication of
22 Defendants' summary judgment motion.

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1 Dated: November 14, 2012

ROPES & GRAY

2 By: /s/ Khue V. Hoang
3 KHUE V. HOANG

4 Attorneys for Defendant
5 EMC CORPORATION

6 Dated: November 14, 2012

DURIE TANGRI LLP

7 By: /s/ Clement S. Roberts
8 CLEMENT S. ROBERTS

9 Attorneys for Defendant
10 QUANTUM CORP.

11 Dated: November 14, 2012

GOODWIN PROCTOR LLP

12 By: /s/ Gregory S. Bishop
13 GREGORY S. BISHOP

14 Attorneys for Defendant
15 NETAPP, INC.

16 Dated: November 14, 2012

SIMMONS BROWDER GIANARIS
ANGELIDES & BARNERD LLC

17 By: /s/ Paul A. Lesko
18 PAUL A. LESKO

19 Attorneys for Plaintiff
20 COMPRESSION TECHNOLOGY
21 SOLUTIONS, LLC

22 **IT IS SO ORDERED.**

23 DATED: November 19, 2012

24 
25 HON. RONALD M. WHYTE
26 UNITED STATES DISTRICT JUDGE

1 **FILER'S ATTESTATION**

2 Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Clement S. Roberts, attest that
3 concurrence in the filing of this document has been obtained.

4
5 Dated: November 14, 2012

/s/ Clement S. Roberts

CLEMENT S. ROBERTS

6
7 **CERTIFICATE OF SERVICE**

8 I certify that all counsel of record is being served on November 14, 2012 with a copy of
9 this document via the Court's CM/ECF system.

10
11 Dated: November 14, 2012

/s/ Clement S. Roberts

CLEMENT S. ROBERTS