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Attorneys for Defendant
 FACEBOOK, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

19 SOFTWARE RIGHTS ARCHIVE, LLC,

20 Plaintiff,

21 v.

22 FACEBOOK, INC.,

23 Defendant.

) No. 12-CV-3970 RMW

) **STIPULATED REQUEST TO**
) **ENLARGE TIME FOR CLAIM**
) **CONSTRUCTION DISCOVERY**

) **[PROPOSED] ORDER**

WHEREAS the Court conducted a Case Management Conference in this matter on December 14, 2012 and set a schedule in this case after the hearing (Dkt. No. 39);

WHEREAS the parties, plaintiff Software Rights Archive, LLC (“SRA”) and defendant Facebook, Inc. (“Facebook”), have met and conferred, and agree that good cause exists to modify the pre-*Markman* discovery schedule in this case;

WHEREAS the parties therefore propose the following modification of the schedule in this case:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
SRA amendment of Patent L.R. 3-1 infringement contentions as to Facebook (upon showing of good cause); Exchange of Proposed Terms and Claim Elements for Construction (Pat. L.R. 4-1) (by plaintiff)	August 16, 2013	September 16, 2013
Facebook amendment of Patent L.R. 3-3 invalidity contentions (upon showing of good cause): Exchange of Proposed Terms and Claim Elements for Construction (Pat. L.R. 4-1) (by defendants)	August 30, 2013	October 3, 2013
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Pat. L.R. 4-2)	September 13, 2013	October 17, 2013
Filing of Joint Claim Construction Chart and Prehearing Statement (Pat. L.R. 4-3)	October 11, 2013	November 7, 2013
Completion of Claim Construction Discovery	November 8, 2013	November 21, 2013

WHEREAS there have been no previous modifications of time in this case;

WHEREAS the proposed modification of the schedule in this case will not affect the schedule for claim construction briefing or hearing in this, or in any of the related cases (*SRA v.*

1 *LinkedIn, Inc.*, Case No. 12-3971 RMW; *SRA v. Twitter, Inc.*, Case No. 12-3972 RMW), set forth
2 in the Court's January 28, 2013 Order (Dkt. No. 39). Claim construction briefing shall still
3 commence on December 12, 2013;

4 IT IS HEREBY STIPULATED by and between counsel for SRA and Facebook that,
5 subject to the Court's approval, the case schedule shall be modified as set forth above to allow the
6 just and efficient conduct of discovery. A [Proposed] Order with the proposed amended schedule
7 is submitted herewith.

8 DATED: June 27, 2013

DINOVO PRICE ELLWANGER & HARDY LLP

9
10 By: /s/ Victor G. Hardy
Victor G. Hardy

11 BARTKO, ZANKEL, BUNZEL & MILLER

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13 By: /s/ W. Paul Schuck
W. Paul Schuck

14 Attorneys for Plaintiff
15 SOFTWARE RIGHTS ARCHIVE, LLC

16 COOLEY LLP

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18 By: /s/ Heidi L. Keefe
Heidi L. Keefe

19 Attorneys for defendant
20 FACEBOOK, INC.

21
22 **ATTESTATION OF E-FILER**

23 In compliance with Local Rule 5-1(i), the undersigned ECF user whose identification and
24 password are being used to file this document, hereby attests that all signatories have concurred in
25 the filing of this document.

26 /s/ W. Paul Schuck
27 W. Paul Schuck
28

[PROPOSED] ORDER

HAVING CONSIDERED the parties' Stipulated Request to Enlarge Time for Claim Construction Discovery and, finding GOOD CAUSE, the following modifications are hereby made to the schedule in this case:

<u>Event</u>	<u>Previous Deadline</u>	<u>New Deadline</u>
SRA amendment of Patent L.R. 3-1 infringement contentions as to Facebook (upon showing of good cause); Exchange of Proposed Terms and Claim Elements for Construction (Pat. L.R. 4-1) (by plaintiff)	August 16, 2013	September 13, 2013
Facebook amendment of Patent L.R. 3-3 invalidity contentions (upon showing of good cause): Exchange of Proposed Terms and Claim Elements for Construction (Pat. L.R. 4-1) (by defendants)	August 30, 2013	October 3, 2013
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (Pat. L.R. 4-2)	September 13, 2013	October 17, 2013
Filing of Joint Claim Construction Chart and Prehearing Statement (Pat. L.R. 4-3)	October 11, 2013	November 7, 2013
Completion of Claim Construction Discovery	November 8, 2013	November 21, 2013

The remainder of the schedule set forth in the Court's January 28, 2013 Order (Dkt. No. 39) shall remain in effect.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: July 10, 2013


 The Honorable Ronald M. Whyte
 United States District Judge