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TECHNOLOGY LICENSING CORP.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TECHNOLOGY LICENSING
CORPORATION,

Plaintiff,

v.

GRASS VALLEY USA, LLC,

Defendant.

AND RELATED COUNTERCLAIMS

Case No. 5:12-cv-06060-EJD
AMENDED

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO
RESCHEDULE CASE
MANAGEMENT CONFERENCE AND
RELATED DATES**

Hon. Edward J. Davila

1 Pursuant to Civil L.R. 6-1(b) and 6-2(a), and subject to the Court's approval, Defendant
2 Grass Valley USA, LLC ("Grass Valley") and Plaintiff Technology Licensing Corporation
3 ("TLC") hereby jointly request that the Court extend the dates currently set with respect to the
4 Case Management Conference ("CMC") scheduled in the above-captioned action.

5 On March 5, 2013, Grass Valley filed its Declination to Proceed Before a Magistrate
6 Judge and Request for Reassignment to a United States District Judge. (ECF No. 21.) On the
7 same day, the above-captioned action was reassigned from the Honorable Maria-Elena James,
8 United States Magistrate Judge, to the Honorable Edward J. Davila, United States District Judge,
9 for all further proceedings. (ECF No. 23.) On March 6, 2013, the Court issued a notice resetting
10 the CMC to July 12, 2013, and setting July 5, 2013, as the deadline for the parties to file their
11 Joint Case Management Statement. (ECF No. 24.)

12 On June 18, 2013, TLC informed Grass Valley that it intends to file a motion to amend its
13 complaint to assert two additional patents in this lawsuit. (Lippetz Decl. at ¶ 1.) The parties
14 therefore agree and hereby stipulate that it would be more efficient to postpone the CMC at least
15 70 days, until it is determined which patents and accused products will be litigated in this lawsuit
16 and the parties' pleadings related to such patents are complete. In particular, having a final
17 resolution on the number and identity of patents in suit, the asserted claims and accused products,
18 will allow the parties to negotiate, and propose for the Court's adoption, an appropriate schedule
19 and scope of discovery in this action.

20 Accordingly, in order to permit the parties time to finalize the pleadings, the parties
21 hereby stipulate and jointly request that the Court reset and extend the CMC deadlines under the
22 current schedule, as follows:

- 23 • Initial CMC: a date convenient to the Court's calendar at least 70 days after the
24 currently scheduled Initial CMC date of July 12, 2013, i.e. no earlier than September
25 20, 2013; and
- 26 • Joint Case Management Statement: 7 days prior to the Initial CMC.

1 The parties further stipulate to extend the date for commencement of discovery to a date
2 21 days before the extended CMC date, and to extend the date for service of initial disclosures to
3 seven days before the extended CMC date, both subject to the Court's approval of the extended
4 CMC date.

5 The requested extension will not affect any other Court dates or deadlines in this case.
6 This request for extension is further supported by the Declaration of Gregory L. Lippetz, filed
7 concurrently herewith in accordance with Civil L.R. 6-2(a).

8 **IT IS SO STIPULATED.**

9 Dated: June 26, 2013

Respectfully submitted,

10 JONES DAY

11 By: /s/Gregory L. Lippetz
12 Gregory L. Lippetz

13 Attorneys for Defendant
14 GRASS VALLEY USA, LLC

15 **ATTESTATION**

16 I, Gregory L. Lippetz, an ECF User whose ID and password are being used to file this
17 Joint Stipulation to Extend Deadlines Related to Case Management Conference, in compliance
18 with Civil L.R. 5-1(i)(3), hereby attest that Joseph N. Hosteny of Niro, Haller & Niro, attorneys
19 for Technology Licensing Corporation, have concurred with this filing.

20
21 Dated: June 26, 2013

NIRO, HALLER & NIRO

22 By: /s/ Joseph N. Hosteny
23 Joseph N. Hosteny

24 Attorneys for Plaintiff
25 TECHNOLOGY LICENSING
26 CORPORATION

1 **IT IS ORDERED THAT:**

2 The Case Management Conference in this matter is rescheduled for September 20,
3 2013. at 10:00 AM. The parties shall file a joint case management conference statement on or
4 before September 13, 2013

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6
7 DATED: 6/28/2013



HON. EDWARD J. DAVILA
U.S. DISTRICT COURT JUDGE

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