

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

1 Steven A. Miller (*Pro hac vice*)
Email: samiller@reedsmith.com
2 Brian D. Roche (*Pro hac vice*)
Email: broche@reedsmith.com
3 Jennifer Y. DePriest (*Pro hac vice*)
Email: jdepriest@reedsmith.com
4 Lawrence E. James, Jr. (*Pro hac vice*)
Email: ljames@reedsmith.com
5 REED SMITH LLP
10 South Wacker Drive
6 Chicago, IL 60606-7507
Telephone: +1 312 207 1000
7 Facsimile: +1 312 207 6400

8 William R. Overend (CA SBN 180209)
Email: woverend@reedsmith.com
9 Kirin K. Gill (CA SBN 259968)
Email: kgill@reedsmith.com
10 REED SMITH LLP
101 Second Street
11 Suite 1800
San Francisco, CA 94105-3659
12 Telephone: +1 415 543 8700
Facsimile: +1 415 391 8269

13 Attorneys for Plaintiffs
14 Koninklijke Philips N.V. and Philips Lumileds
Lighting Company LLC
15
16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 Koninklijke Philips N.V. and Philips Lumileds
Lighting Company LLC,
21
22 Plaintiff,

23 vs.

24 Elec-Tech International Co., Ltd., Elec-Tech
International (H.K.) Co., Ltd., Wuhu Elec-Tech
Photoelectric Technology Co. Ltd., ETI
25 Yangzhou Photovoltaic Technology Co., Ltd.,
Dalian Deheo Photovoltaic Technology Co., Ltd.,
26 Shenzhen Retop LED Display Co., Ltd., ETI
Solid State Lighting Inc., ETI LED Solutions Inc.,
27 Donglei Wang, Eva Chan and Gangyi Chen,
28 Defendants.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Claude M. Stern (Bar No. 96737)
claudestern@quinnemanuel.com
Michael D. Powell (Bar No. 202850)
mikepowell@quinnemanuel.com
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065-2139
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
Minyao Wang (Bar No. 4744314)
minyaowang@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000

Attorneys for Defendants

No.: 5:14-CV-2737

**STIPULATION FOR ENTRY OF
JUDGEMENT**

~~PROPOSED~~ ORDER

1 Plaintiffs Koninklijke Philips N.V. and Philips Lumileds Lighting Company LLC
2 (collectively “Plaintiffs”) and Defendants Elec-Tech International Co., Ltd., Elec-Tech International
3 (H.K.) Co., Ltd., Wuhu Elec-Tech Photoelectric Technology Co., Ltd., ETI Yangzhou Photovoltaic
4 Technology Co., Ltd., Dalian Deheo Photovoltaic Technology Co., Ltd., Shenzhen Retop LED
5 Display Co., Ltd., ETI Solid State Lighting Inc., ETI LED Solutions Inc., Donglei Wang, Eva Chan
6 and Gangyi Chen (collectively “Defendants” and together with Plaintiffs, the “Parties”), through
7 their respective undersigned counsel, hereby stipulate as follows:

8 WHEREAS, on March 20, 2015, the Court dismissed Plaintiffs’ claim under the Computer
9 Fraud & Abuse Act with prejudice, and declined to exercise supplemental jurisdiction over
10 Plaintiffs’ remaining claims, which were dismissed without prejudice (Dkt. 122);

11 WHEREAS, on June 19, 2015, the Clerk of the Court taxed costs in the amount of
12 \$43,495.98 against Plaintiffs (Dkt. 141);

13 WHEREAS, the Parties have agreed that judgment should be entered in this case with the
14 proposed judgment attached hereto as **Exhibit A**;

15 WHEREFORE, IT IS HEREBY STIPULATED THAT:

- 16 (i) Judgment is hereby entered in this case consistent with the Court’s March 20, 2015
17 Order on Motions to Dismiss (Dkt. 122) and with the proposed judgment attached
18 hereto as **Exhibit A**;
- 19 (ii) The Clerk of the Court shall separately enter judgment in this case pursuant to Federal
20 Rule of Civil Procedure 58(a), with the form attached hereto as **Exhibit A**.

21
22 DATED: August 12, 2015

REED SMITH, LLP

23
24 By: William R. Overend
25 Steven A. Miller (IL SBN 3125365)
26 (Pro hac vice)
27 Email: samiller@reedsmith.com
28 Brian D. Roche (IL SBN 6183795)
(Pro hac vice)
Email: broche@reedsmith.com
Jennifer Y. DePriest (IL SBN 6272137)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

(Pro hac vice)
Email: jdepriest@reedsmith.com
Lawrence E. James, Jr. (IL SBN 6289823)
(Pro hac vice)
Email: ljames@reedsmith.com
REED SMITH LLP
10 South Wacker Drive
Chicago, IL 60606-7507
Telephone: +1 312 207 1000
Facsimile: +1 312 207 6400

William R. Overend (CA SBN 180209)
Email: woverend@reedsmith.com
Kirin K. Gill (CA SBN 259968)
Email: kgill@reedsmith.com
REED SMITH LLP
101 Second Street
Suite 1800
San Francisco, CA 94105-3659
Telephone: +1 415 543 8700
Facsimile: +1 415 391 8269

Attorneys for Plaintiffs
Koninklijke Philips N.V. and Philips Lumileds
Lighting Company LLC

DATED: August 12, 2015

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By /s/ Michael Powell
Claude M. Stern
Michael D. Powell
Minyao Wang (admitted *pro hac vice*)

Attorneys for Defendants

ATTESTATION

I, Michael D. Powell, am the ECF user whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that William R. Overend has concurred in this filing.


Dated: August 12, 2015

/s/ Michael D. Powell
Michael D. Powell

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: August 12, 2015



The Honorable Beth Labson Freeman
United States District Judge