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19 **UNITED STATES DISTRICT COURT**
 20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
 21 **SAN JOSE DIVISION**

22 CISCO SYSTEMS, INC.,
 23
 24 Plaintiff,
 25
 26 v.
 27
 28 STMICROELECTRONICS, INC. and
 STMICROELECTRONICS, S.r.l.,
 Defendant.

Case No. 5:14-cv-03236-RMW-HRL
JOINT STIPULATION AND ORDER TO EXTEND TIME TO SUBMIT EVIDENCE IN SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S MOTION TO SEAL PURSUANT TO LOCAL RULE 79-5(e)

1 Plaintiff Cisco Systems, Inc. (“Cisco”) and Defendants STMicroelectronics, Inc. (“STMicro-
2 US”) and STMicroelectronics, S.r.l. (“STMicro-Italy,” and collectively, “Defendants”), by and
3 through their undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on July 14, 2015, Cisco filed its opposition to STMicro-Italy’s motion to
5 dismiss for lack of personal jurisdiction (the “Opposition,” ECF No. 106);

6 WHEREAS, the Opposition includes various exhibits, including seven with respect to which
7 Cisco believes STMicro-US and/or STMicro-Italy will take the position that they should be filed
8 under seal, specifically:

- 9 1. ECF No. 105-3 – Exhibit B to DECLARATION OF THIERRY SOLOMON IN
10 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
11 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 12 2. ECF No. 105-5 – Exhibit C to DECLARATION OF THIERRY SOLOMON IN
13 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
14 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 15 3. ECF No. 105-7 – Exhibit D to DECLARATION OF THIERRY SOLOMON IN
16 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
17 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 18 4. ECF No. 105-9 – Exhibit E to DECLARATION OF THIERRY SOLOMON IN
19 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
20 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 21 5. ECF No. 105-11 – Exhibit F to DECLARATION OF THIERRY SOLOMON IN
22 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
23 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 24 6. ECF No. 105-13 – Exhibit A to DECLARATION OF ARDAVAN POURHAMZEH IN
25 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
26 STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
SOUGHT TO BE SEALED.
- 27 7. ECF No. 105-15 – Exhibit A to DECLARATION OF RICHARD MARSZALIK IN
28 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.’S OPPOSITION TO
STMICROELECTRONICS, S.R.L.’S MOTION TO DISMISS FOR LACK OF

1 PERSONAL JURISDICTION. UNREDACTED VERSION OF DOCUMENT(S)
2 SOUGHT TO BE SEALED.

3 WHEREAS, Cisco filed an administrative motion to seal each of these exhibits (ECF No.
4 105);

5 WHEREAS, pursuant to Local Rule 79-5(e), Defendants have until July 20, 2015 (because
6 the fourth day from Cisco's July 14, 2015 filing falls on a weekend day) to file a declaration to
7 support the sealing;

8 WHEREAS, the parties have agreed to extend Defendants' time to file a declaration as
9 required by Local Rule 79-5(e) to July 30, 2015;

10 NOW THEREFORE, Cisco and Defendants stipulate as follows, subject to the Court's
11 approval:

- 12 • Defendants shall have until July 30, 2015, to file and serve a declaration in support of
13 sealing pursuant to Local Rule 79-5(e).

14 IT IS SO STIPULATED.

15
16 Dated: July 17, 2015

WINSTON & STRAWN LLP

17
18 By: /s/ Krista M. Enns
19 Krista M. Enns
20 Attorneys for Plaintiff
CISCO SYSTEMS, INC.

21 Dated: July 17, 2015

SIDLEY AUSTIN LLP

22
23 By: /s/ Nicole Ryan
24 Nicole Ryan
Attorneys for Defendant
STMICROELECTRONICS, INC.

25 Dated: July 17, 2015

SIDLEY AUSTIN LLP

26
27 By: /s/ Nicole Ryan
28 Nicole Ryan
Attorneys for Defendant
STMICROELECTRONICS, S.r.l.

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.

2
3 Dated: July __, 2015

Ronald M. Whyte

Ronald M. Whyte
United States District Judge

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5
6 **LOCAL RULE 5-1 ATTESTATION**

7 I, Krista M. Enns, am the ECF User whose ID and password was used to file this JOINT
8 STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO SUBMIT EVIDENCE IN
9 SUPPORT OF PLAINTIFF CISCO SYSTEMS, INC.'S MOTION TO SEAL PURSUANT TO
10 LOCAL RULE 79-5(e). In compliance with Local Rule 5-1(i)(3), I hereby attest that, counsel for
11 Defendants, concurred in this filing.

12
13 Dated: July 17, 2015

By: /s/Krista M. Enns
Krista M. Enns

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