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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

TESSERA, INC.,

Plaintiff,

v.

TOSHIBA CORPORATION,

Defendant.

C.A. No. 5:15-CV-02543-BLF

**JOINT STIPULATION AND ORDER
 REGARDING
 MEET AND CONFER AND BRIEFING
 DEADLINES**

Hon. Nathanael M. Cousins

1 Plaintiff Tessera, Inc. (“Tessera”) and Defendant Toshiba Corporation (“Toshiba”), by
2 and through their undersigned counsel of record, hereby respectfully submit this Joint
3 Stipulation and [Proposed] Order Regarding Meet and Confer and Briefing Deadlines.

4 On April 6-7 and April 7-8, 2016, two depositions of Toshiba 30(b)(6) designees took
5 place and four additional depositions of Toshiba 30(b)(6) designees are scheduled to take place
6 on April 11-12, 12-13, 13-14, and 14-15, 2016. The parties anticipate that their meet and confer
7 regarding the 30(b)(6) topics will be significantly aided by the deposition testimony. Moreover,
8 the parties believe it will be difficult to reach a mutually-agreeable resolution until those
9 depositions have taken place. Accordingly, subject to the Court's approval, the parties hereby
10 stipulate to extend all dates and deadlines in the Court's Order (Docket No. 96) dated April 7,
11 2016, as follows:

12 1. The parties will meet and confer regarding the 30(b)(6) topics addressed by
13 Toshiba's pending motion (Docket No. 95) promptly after the depositions taking place on April
14 11-15, 2016.

15 2. If the parties are unable to resolve the issues, Tessera's opposition to Toshiba's
16 motion for protective order (Docket No. 95) will be due April 21, 2016 and Toshiba's reply on
17 April 28, 2016.

18 3. Any hearing on Toshiba's Motion for Protective Order would occur on May 4,
19 2016 at 1:00 p.m. or any date thereafter convenient for the Court.

20 *[Signature page and Order follows.]*

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IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Respectfully submitted,

DATED: April 11, 2016

BAKER BOTTS L.L.P.

/s/ Michael Hawes
Michael Hawes
Attorneys for Defendant
TOSHIBA CORPORATION

DATED: April 11, 2016

IRELL & MANELLA LLP

/s/ Lisa S. Glasser
Lisa S. Glasser
Attorneys for Plaintiff
TESSERA, INC.

IT IS SO ORDERED.

DATED: April 12, 2016

Nathanael M. Cousins
United States

