

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN MEDICAL SYSTEMS, INC. and
LASERSCOPE,

Plaintiffs,

v.

BIOLITEC, INC.,

Defendant.

Civil Action No. 3:07-CV-30109-MAP

AMERICAN MEDICAL SYSTEMS, INC. and
LASERSCOPE,

Plaintiffs,

v.

BIOLITEC, INC., BIOLITEC AG,
CERAMOPTEC INDUSTRIES, INC.,
CERAMOPTEC GmbH, ANDAOPTEC, LTD.,
and BIOLITEC SIA,

Defendants.

Civil Action No. 3:08-CV-30061-MAP

**STIPULATION AND [PROPOSED] ORDER EXTENDING STAY
OF LITIGATION TO FACILITATE COMPLETION OF SETTLEMENT**

Plaintiffs American Medical Systems, Inc. and Laserscope (collectively "AMS") and Defendants biolitec, Inc., *et al.* (collectively "biolitec") jointly submit this stipulation:

WHEREAS, on July 1, 2011, the Court Ordered that the above-captioned actions be stayed until August 19, 2011 to facilitate settlement discussions (D.I. #122 in Civil Action No. 3:07-CV-30109-MAP; D.I. #259 in Civil Action No. 3:08-CV-30061-MAP);

ALLOWED. Extension 1/13/12.
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WHEREAS, from time to time, the Court has extended the stay at the request of the parties;

WHEREAS, by an Order dated November 23, 2011, the Court directed the parties to submit a proposed schedule, or alternatively, provide the Court with a status update and further request to maintain the stay;

WHEREAS, the parties have finalized confidential settlement documents and are in the process of executing the same;

WHEREAS, after the settlement documents are executed and certain prerequisites to the dismissal of these cases are met, the parties will file stipulations of dismissal for Court approval;

WHEREAS, in light of the foregoing, the parties jointly wish to continue the stay to avoid incurring the substantial costs associated with proceeding with fact discovery and additional motion practice;

WHEREAS, the parties have agreed to extend the stay through and including January 13, 2012; and

IT IS HEREBY STIPULATED, by and between the parties, and through their respective attorneys of record, subject to the approval of the Court that:

- (1) This litigation is stayed, including all discovery, through and including January 13, 2012, to allow the parties to complete their settlement;
- (2) On or before January 13, 2012, the parties shall submit either a stipulation of dismissal or a status report advising the Court of when the parties anticipate dismissing these cases.

- (3) In view of the foregoing, the parties respectfully request that the Court enter the Order in the form submitted herewith.

Respectfully submitted,

Dated: December 12, 2011

Dated: December 12, 2011

/s/ Leland G. Hansen

/s/ Mark D. Giarratana

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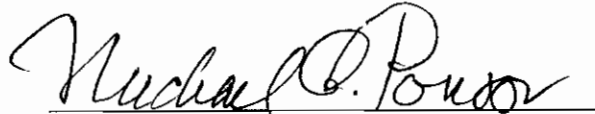
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Attorneys for Plaintiffs

Attorneys for Defendants

IT IS SO ORDERED,

Dated: Dec. 14, 2011



Honorable Michael A. Ponsor
United States District Judge