

The Honorable Richard A. Jones

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IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICROSOFT CORPORATION,)	Civ. Act. 2:11-cv-00485
)	
Plaintiff,)	HON HAI PRECISION INDUSTRY
)	CO., LTD., FOXCONN
v.)	INTERNATIONAL HOLDINGS
)	LTD., FOXCONN ELECTRONICS,
BARNES & NOBLE, INC.,)	INC., AND FOXCONN PRECISION
BARNESANDNOBLE.COM LLC, HON HAI)	COMPONENT (SHEN ZHEN) CO.,
PRECISION INDUSTRY CO., LTD.,)	LTD.'S REPLY IN SUPPORT OF
FOXCONN INTERNATIONAL HOLDINGS)	THEIR MOTION TO STAY
LTD., FOXCONN ELECTRONICS, INC.,)	
FOXCONN PRECISION COMPONENT)	NOTE ON MOTION CALENDAR:
(SHENZHEN) CO. LTD., and INVENTEC)	JUNE 3, 2011
CORPORATION,)	
)	
Defendants.)	
)	
)	
)	

Hon Hai Precision Industry Co., Ltd., Foxconn International Holdings Ltd., Foxconn Electronics, Inc. and Foxconn Precision Component (Shen Zhen) Co., Ltd. (collectively, the “Foxconn Defendants”), by and through their undersigned counsel, respectfully submit this Reply in support of their Motion to Stay [Dkt. No. 34] (“Motion”).

Plaintiff Microsoft Corporation (“Microsoft”) filed its Response to the Foxconn Defendants’ Motion on May 31, 2011. Dkt. No. 41. In its Response, Microsoft does not oppose the request for a stay, but asks that the Court toll Microsoft’s obligation to serve the non-served parties for the duration of the stay, and further requests that Microsoft be permitted 120 days after

1 the stay is lifted to effect any such service. *Id.* at 4. The Foxconn Defendants are agreeable to
2 Microsoft's request that the obligation to serve process, along with all other obligations in this
3 litigation, be tolled for the duration of the stay, and thus that Microsoft will not attempt such
4 service on the Foxconn Defendants during the pendency of the stay. However, in view of the fact
5 that 74 days have already passed since Microsoft filed the Complaint in this action, Microsoft
6 should be permitted no more than 60 days after the stay is lifted to effect service upon the
7 Foxconn Defendants.

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9 Dated: June 3, 2011

Respectfully submitted,
DORSEY & WHITNEY LLP

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/s/Douglas F. Stewart
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Attorneys for Defendants,
**FOXCONN ELECTRONICS, INC., FOXCONN
PRECISION COMPONENTS (SHEN ZHEN) CO.,
LTD., FOXCONN INTERNATIONAL HOLDINGS
LTD., AND HON HAI PRECISION INDUSTRY CO.,
LTD.**

CERTIFICATE OF SERVICE

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I, Douglas F. Stewart, certify that on June 3rd, 2011, the foregoing HON HAI PRECISION INDUSTRY CO., LTD., FOXCONN INTERNATIONAL HOLDINGS LTD., FOXCONN ELECTRONICS, INC., AND FOXCONN PRECISION COMPONENT (SHEN ZHEN) CO., LTD.'S REPLY IN SUPPORT OF THEIR MOTION TO STAY and PROPOSED ORDER were filed with the Clerk of the Court using ECF Notification. Counsel were served by ECF Notification and/or via US Mail.

DATED this 3rd day of June, 2011.

/s/Douglas F. Stewart _____
Douglas F. Stewart