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6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10
11 TECHNOLOGY PROPERTIES LIMITED
12 LLC, et al.,

13 Plaintiffs,

14 vs.

15 BARNES & NOBLE, INC.,

16 Defendant.

CASE NO. 3:12-cv-03863-VC

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
DISCLOSE INVALIDITY
CONTENTIONS**

17 **STIPULATION**

18 Pursuant to Civil L.R. 6-2 and 7-12, Defendant Barnes & Noble, Inc. (“Barnes & Noble”)
19 and Plaintiffs Technology Properties Ltd., Patriot Scientific Corp., and Phoenix Digital Solutions
20 (collectively “Plaintiffs”) hereby stipulate and request an order from the Court extending by one
21 week the time for Barnes & Noble to serve its invalidity contentions and accompanying document
22 production pursuant to Patent L.R. 3-3 and 3-4.

23
24 Shortly after this case was filed, the Court stayed the case pursuant to 28 U.S.C. § 1659(a)
25 and its inherent authority. As a result, the time for serving infringement contentions and invalidity
26 contentions was tolled. After this Court lifted the stay, the parties agreed to exchange
27 infringement contentions on July 22, 2014 and invalidity contentions on September 5, 2014.

1 These dates were submitted to the Court in the Joint Case Management Statement filed on July 1,
2 2014 (D.E. 28).

3 Barnes & Noble requests a one-week extension of time until September 12, 2014 to serve
4 its invalidity contentions and accompanying document production in order to enable it to more
5 fully present its contentions. Plaintiffs stipulate to Barnes & Noble's requested extension.
6

7 As required by Civil L.R. 6-2, the parties state that other than the adjustments made
8 necessary by the stay as discussed above, they are not aware of any other time modifications made
9 in this case. The requested extension would not affect any pending deadlines in the case.
10

11 DATED: September 4, 2014

Respectfully submitted,

12 QUINN EMANUEL URQUHART &
13 SULLIVAN, LLP
14

15 By /s/ David Eiseman

16 David Eiseman

Attorneys for Defendant Barnes & Noble, Inc.
17

18 DATED: September 4, 2014

Respectfully submitted,

19 AGILITY IP LAW
20

21 By /s/ James Otteson

22 James Otteson

Attorneys for Plaintiffs Technology Properties
23 Ltd., Patriot Scientific Corp., and Phoenix Digital
24 Solutions
25
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September ____, 2014

VINCE CHHABRIA
United States District Judge

ATTESTATION OF CONCURRENCE

I, David Eiseman, am the ECF User whose ID and password are being used to file this STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO DISCLOSE INVALIDITY CONTENTIONS. I hereby attest that James Otteson has concurred in this filing on behalf of the Plaintiffs.

DATED: September 4, 2014

By /s/ David Eiseman

CERTIFICATE OF SERVICE

I hereby certify that, on September 4, 2014, I caused the foregoing document to be served on all counsel of record via the Court's CM/ECF system.

DATED: September 4, 2014

By /s/ David Eiseman