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11 12	LG ELECTRONICS U.S.A., INC.  UNITED STATES DI	STRICT COURT	
13	NORTHERN DISTRICT OF CALIFORNIA		
14	SAN JOSE DIVISION		
15 16	TECHNOLOGY PROPERTIES LIMITED LLC, PHOENIX DIGITAL SOLUTIONS LLC, and PATRIOT SCIENTIFIC CORPORATION,	Case No. 5:12-cv-03880-PSG	
17 18	Plaintiffs, v.	NOTICE OF UNOPPOSED MOTION AND UNOPPOSED MOTION TO STAY PATENT INFRINGEMENT CASE	
19 20 21	LG ELECTRONICS, INC. and LG ELECTRONICS U.S.A., INC.,  Defendants.	Date: October 30, 2012 Time: 10:00 a.m. Courtroom: 5 Judge: Hon. Paul S. Grewal	
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## TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on October 30, 2012, at 10:00 a.m., or as soon thereafter as the matter may be heard, in Courtroom 5 of this Court before the Honorable Paul S. Grewal, Defendants LG Electronics, Inc. and LG Electronics, U.S.A., Inc. (collectively, "LG") respectfully move, pursuant to 28 U.S.C. § 1659(a), for an order staying the patent infringement claims in this action filed by Technology Properties Limited LLC, Phoenix Digital Solutions LLC and Patriot Scientific Corporation (collectively, "Plaintiffs") relating to one of the patents at issue, U.S. Patent No. 5,809,336, until an investigation before the United States International Trade Commission ("ITC") involving the same patent and the same parties is concluded.

In addition to its statutory right to a stay regarding the one patent commonly asserted in the ITC, LG respectfully moves for a discretionary stay of the entire action, which includes patent infringement claims on two additional patents—both of which are directly related to the overlap patent—until the ITC proceeding noted above is concluded.

This motion is made pursuant to 28 U.S.C. § 1659(a) and the Court's inherent power to stay an action when warranted. It is based on the accompanying memorandum of points and authorities, the Declaration of Shelley Mack, all pleadings and papers of record and on file in this case, and any and all other argument and materials submitted to the Court on or before the time of the decision in this matter.

Plaintiffs do not oppose LG's motion.

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1	Dated: September 20, 2012	Respectfully submitted,
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15		LG ELECTRONICS U.S.A., INC.
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1	CERTIFICATE OF SERVICE	
2	The undersigned hereby certifies that a true and correct copy of the above and foregoing	
3	document has been served on September 20, 2012 to all counsel of record who are deemed to have	
4	consented to electronic service via the Court's CM/ECF system per Fed. R. Civ. P. 5(b)(3). Any	
5	other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.	
6		
7	Dated: September 20, 2012	
8	By: s/Shelley K. Mack	
9	Shelley Mack (SBN 209596)  mack@fr.com	
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