

1 JEAN-PAUL CIARDULLO, CA Bar No. 284170
jciardullo@foley.com
2 FOLEY & LARDNER LLP
555 South Flower Street, Suite 3300
3 Los Angeles, CA 90071
Telephone: 213-972-4500
4 Facsimile: 213-486-0065

5 ELEY O. THOMPSON (*pro hac vice*)
ethompson@foley.com
6 FOLEY & LARDNER LLP
321 N. Clark Street, Suite 2800
7 Chicago, IL 60654-5313
Telephone: 312-832-4359
8 Facsimile: 312-83204700

9 RUBEN J. RODRIGUES (*pro hac vice*)
rrodrigues@foley.com

10 LUCAS I. SILVA (*pro hac vice*)
lsilva@foley.com

11 JOHN W. CUSTER (*pro hac vice*)
jcuster@foley.com

12 FOLEY & LARDNER LLP
111 Huntington Avenue, Suite 2500
13 Boston, MA 02199-7610
Telephone: (617) 342-4000
14 Facsimile: (617) 342-4001

15 *Attorneys for Plaintiff*
16 *Philips North America LLC*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 Philips North America LLC,

21 *Plaintiff,*

22 vs.

23
24 Garmin International, Inc. and
Garmin Ltd.,

25 *Defendants.*
26

Case No. 2:19-cv-06301-AB-KS

**JOINT STIPULATION TO RE-SET
HEARING DATE FOR PLAINTIFF'S
RULE 54(b) MOTION TO
DECEMBER 11, 2020**

Hon. André Birotte Jr.

1 Plaintiff Philips North America LLC (“Philips”) and Defendants Garmin International,
2 Inc. and Garmin Ltd. (collectively “Garmin”) hereby jointly stipulate and respectfully request
3 that the hearing date for Philips’s Rule 54(b) Motion (Dkt. 110) be re-set from December 4,
4 2020 to **December 11, 2020**, and that parties’ briefing schedule be keyed off that date. For its
5 part, Philips here states that it makes this stipulation in the interests of professional cooperation
6 and that it does not waive any argument concerning the need to timely resolve the Motion. The
7 proposed scheduling change does not affect any other deadlines in the case.
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Dated: November 6, 2020

Respectfully submitted,

2 **LAMKIN IP DEFENSE**

FOLEY & LARDNER LLP

3 /s/ Rachael D. Lamkin

/s/ Jean-Paul Ciardullo

4 Rachael D. Lamkin (246066)

Jean-Paul Ciardullo, CA Bar No. 284170

5 LAMKIN IP DEFENSE

jciardullo@foley.com

6 One Harbor Drive, Suite 304

555 South Flower Street, Suite 3300

7 Sausalito, CA 94965

Los Angeles, CA 90071

8 RDL@LamkinIPDefense.com

Telephone: 213-972-4500

9 916.747.6091

Facsimile: 213-486-0065

10 *Attorney for Defendant*

Eley O. Thompson (*pro hac vice*)

11 *Garmin USA, Inc.*

ethompson@foley.com

12 Michelle L. Marriott (*pro hac vice*)

321 N. Clark Street, Suite 2800

13 michelle.marriott@eriseip.com

Chicago, IL 60654-5313

14 Erise IP, P.A.

Telephone: 312-832-4359

15 7015 College Blvd., Suite 700

Facsimile: 312-83204700

16 Overland Park, KS 66211

Lucas I. Silva (*pro hac vice*)

17 (913) 777-5600 Telephone

lsilva@foley.com

18 (913) 777-5601 Facsimile

Ruben J. Rodrigues (*pro hac vice*)

rrodrigues@foley.com

111 Huntington Avenue, Suite 2500

Boston, MA 02199-7610

Telephone: (617) 342-4000

Facsimile: (617) 342-4001

Attorneys for Plaintiff

Philips North America LLC

22 I certify that Rachael D. Lamkin authorized the electronic filing of this document.

23 /s/ Jean-Paul Ciardullo