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Attorneys for Defendant
HIKVISION USA, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NETWORK-1 TECHNOLOGIES,
INC.,

Plaintiff,

v.

HIKVISION USA, INC.,

Defendant.

Case No. 2:22-CV-08050 CJC(JDEx)
**STIPULATION TO AMEND
COMPLAINT**

Judge: Hon. Cormac J. Carney

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Local Rules 7-1 and
15-1, Plaintiff Network-1 Technologies, Inc. and Defendant Hikvision USA, Inc.,
by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff served its initial Complaint in this action on November



1 7, 2022;

2 WHEREAS, the Parties have met and conferred regarding the adequacy of
3 the Complaint under Rule 12;

4 WHEREAS, Plaintiff wishes to amend its Complaint in response to those
5 conferences;

6 WHEREAS, Plaintiff does not waive its right to subsequent amendment
7 under Rule 15(a)(1);

8 WHEREAS, Defendant agrees that it would be most efficient for Plaintiff to
9 serve its amended complaint prior to Defendant's motion, answer, or other response
10 to any complaint in this action;

11 WHEREAS, Defendant's stipulation is limited to the filing of an amended
12 complaint only, and does not impact any rights, claims, or defenses that Defendant
13 may have and otherwise has no substantive impact on Defendant's arguments or
14 procedural posture in this case; and

15 THEREFORE, the Parties hereby stipulate under Rule 15(a)(2) that Plaintiff
16 may amend its Complaint at this time, provided that the amendment does not
17 impact Defendant's rights, claims, or defenses or Defendant's ability to respond by
18 way of appropriate motion (e.g., Rule 12 motion), and the amendment does not
19 impact Plaintiff's right to later seek to further amend under Rule 15(a)(1).
20 Plaintiff's proposed First Amended Complaint is submitted herewith as Exhibit A.
21 Rather than respond to the originally-filed Complaint, Defendant shall have 14 days
22 to respond to the First Amended Complaint once it is filed in accordance with the
23 proposed order.

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1 Dated: April 18, 2023

Respectfully submitted,
DOVEL & LUNER, LLP

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By: /s/ Richard Lyon
Richard Lyon

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Attorneys for Plaintiff
NETWORK-1 TECHNOLOGIES, INC.

7 Dated: April 18, 2023

Respectfully submitted,
JONES DAY

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By: /s/ Alexis Adian Smith
Alexis Adian Smith

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Attorneys for Defendant
HIKVISION USA, INC.

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ATTESTATION

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In accordance with Local Rule 5-4.3.4(a)(2), I attest that concurrence in the filing of this document has been obtained from all other signatories listed and on whose behalf this filing is submitted.

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/s/ Richard Lyon
Richard Lyon

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