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16 CHECK POINT SOFTWARE
17 TECHNOLOGIES, INC. and CHECK POINT
SOFTWARE TECHNOLOGIES, LTD.

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 FINJAN, INC., a Delaware Corporation

22 Plaintiff,

23 v.

24 CHECK POINT SOFTWARE
25 TECHNOLOGIES, INC., a Delaware
26 Corporation and CHECK POINT SOFTWARE
TECHNOLOGIES, LTD., an Israeli Limited
Company

27 Defendants.
28

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FINJAN, INC.

Case No. 3:18-cv-02621-WHO (JCS)

**JOINT MOTION, STIPULATION AND
[PROPOSED] ORDER EXTENDING
CASE DEADLINES**

1 Pursuant to Local Rules 6-1(b), 6-2 and 7-12, Plaintiff Finjan, Inc. (“Finjan”) and
2 Defendants Check Point Software Technologies, Inc. and Check Point Technologies, Ltd.
3 (collectively, “Check Point”) jointly request the Court to modify the case schedule as set forth in
4 this stipulation.

5 WHEREAS, on January 17, 2020, the Court issued an Order regarding Check Point’s
6 Motion to Strike Finjan’s Infringement Contentions (Dkt. No. 247) and a Notice of Intent to
7 Appoint Master Under Rule 53 to resolve certain disputes regarding Finjan’s Infringement
8 Contentions (Dkt. No. 248).

9 WHEREAS, Finjan and Check Point have agreed that the scope of the case may be
10 impacted based on the pending resolution of disputes before the special master. As a result, Finjan
11 and Check Point have agreed to extend certain claim construction deadlines. The proposed
12 extensions below will not have a material effect on the remainder of this case.

13 WHEREAS, the Court previously modified the schedule in this case twelve (12) times: (i)
14 to adjust the briefing schedule for Finjan’s Motion to Impute Service, Dkt. No. 35; (ii) to extend
15 the hearing date on Finjan’s Motion to Impute Service by seven days, Dkt. No. 42; (iii) to adjust
16 the briefing schedule and hearing on Finjan’s Motion to Strike and extend Check Point’s time to
17 respond to the complaint, Dkt. No. 52; (iv) to extend Check Point’s time to file a Reply in support
18 of its Motion to Enforce Order and Strike Infringement Contentions, Dkt. No. 64; (v) to extend
19 Finjan’s time to respond to Check Point’s affirmative defenses, Dkt. No. 82; (vi) to grant Check
20 Point’s motion to modify the claim construction schedule, Dkt. No. 84; (vii) to grant Check Point’s
21 motion to continue to change the claim construction schedule, Dkt. No. 108; (viii) to grant the
22 parties’ stipulation for Finjan to file its opposition to Check Point’s Motion to Amend Invalidity
23 Contentions, Dkt. No. 149; (ix) to grant the parties’ stipulation to change the parties’ briefing
24 schedule related to Check Point’s Motion to Strike Infringement Contentions, Dkt. No. 227; (x) to
25 grant the parties’ stipulation to an extended case schedule following the Court’s mandated meet-
26 and-confer, Dkt. Nos. 236, 238; (xi) to grant the parties’ stipulation to extend certain claim
27 construction deadlines, Dkt. No. 246; and (xii) to grant the parties’ stipulation to further extend
28 certain claim construction deadlines, Dkt. No. 252.

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NOW, THEREFORE, the parties hereby stipulate and request the Court to modify the case schedule to take all currently scheduled deadlines off-calendar. Ten days after the Master issues her ruling resolving the disputes as set forth in Dkt. 248, the parties shall submit a new schedule to the Court for the remainder of the case.

1 **IT IS SO STIPULATED.**

2
3 Dated: February 7, 2020

Respectfully submitted,

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Respectfully submitted,

19 Dated: February 7, 2020

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