

JUANITA R. BROOKS (SBN 75934)
brooks@fr.com
JASON W. WOLFF (SBN 215819)
wolff@fr.com
FISH & RICHARDSON P.C.
12860 El Camino Real, Suite 400
San Diego, CA 92130
Telephone: (858) 678-5070
Fax: (858) 678-5099

ROBERT P. COURTNEY (SBN 248392)
courtney@fr.com
FISH & RICHARDSON P.C.
3200 RBC Plaza
60 South 6th Street
Minneapolis, MN 55402
Telephone: (612) 335-5070
Fax: (612) 288-9696

Attorneys for Plaintiff
FINJAN LLC

RYAN R. SMITH (SBN 229323)
rsmith@wsgr.com
CHRISTOPHER D. MAYS (SBN 266510)
cmays@wsgr.com
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
650 Page Mill Road
Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 493-6811

EDWARD G. POPLAWSKI (SBN 113590)
epoplawski@wsgr.com
OLIVIA M. KIM (SBN 228382)
okim@wsgr.com
TALIN GORDNIA (SBN 274213)
tgordnia@wsgr.com
WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
633 West Fifth Street, Suite 1550
Los Angeles, CA 90071
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

Attorneys for Defendant
QUALYS INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

FINJAN LLC,

Plaintiff,

v.

QUALYS INC.,

Defendant.

Case No.: 4:18-cv-07229-YGR

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

**As Modified by the Court **

Date Complaint Filed: November 29, 2018

Trial Date: None Set

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Finjan LLC (“Finjan”) and Defendant
2 Qualys Inc. (“Qualys”) (collectively, “the Parties”), hereby jointly stipulate and respectfully request that
3 the Court amend the case schedule.

4 In support of these stipulated requests, the Parties jointly state as follows:

5 WHEREAS, one of Qualys’s attorneys will be undergoing surgery and will need some time to
6 recover before taking expert depositions, the parties have conferred and agreed that, subject to the
7 Court’s approval, the case schedule should be amended as set forth below in order to account for the
8 recovery of Qualys’s attorney;

9 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among counsel
10 for Finjan and Qualys that the deadlines set forth below be amended as follows:

Event	Previous Date	Agreed Proposed Date/Deadline
Close of expert discovery	1 month after the service of rebuttal expert reports	March 5, 2021 (changed from February 12, 2021)
Last day for a pre-filing conference on summary judgment motions	three weeks after the close of expert discovery	March 26, 2021 (changed from March 5, 2021)
Plaintiff's opening summary judgment briefs	three weeks after the pre-filing conference on summary judgment motions	No change
Defendant's opposition summary judgment briefs and cross motion for summary judgment	three weeks after Plaintiff's opening summary judgment brief	No change
Plaintiff's reply summary judgment briefs and opposition to Defendant's cross motion for summary judgment	three weeks after Defendant's opposition summary judgment brief	No change
Defendant's reply for its cross motion for summary judgment	three weeks after Plaintiff's opposition summary judgment brief	No change
Summary judgment hearing	Subject to the Court's availability	No change
Final Pretrial Conference	Subject to the Court's availability	No change
Trial	Subject to the Court's availability	No change

Dated: January 22, 2021

/s/ Jason W. Wolff

Jason W. Wolff (CA SBN 215819)

wolff@fr.com

FISH & RICHARDSON P.C.

12860 El Camino Real, Suite 400

San Diego, CA 92130

Telephone: (858) 678-5070

Facsimile: (858) 678-5099

1 Dated: January 22, 2021

/s/ Ryan R. Smith

Ryan R. Smith (SBN 229323)

rsmith@wsgr.com

2 WILSON SONSINI GOODRICH & ROSATI

3 Professional Corporation

4 650 Page Mill Road

Palo Alto, CA 94304-1050

5 Telephone: (650) 493-9300

6 Facsimile: (650) 493-6811

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from any other signatory to this document

11 /s/ Ryan R. Smith

12 Ryan R. Smith

As Modified by the Court
~~PROPOSED~~ ORDER

Pursuant to the parties' Stipulation, it is hereby ordered that the deadlines set forth below are extended as follows:

Event	Amended Deadline
Close of expert discovery	March 5, 2021
Last day for a pre-filing conference on summary judgment motions	March 26, 2021

PURSUANT TO STIPULATION, IT IS SO ORDERED with following caveat: Parties are advised that by seeking to move the dates relative to any summary judgment motion, they are effectively eliminating three weeks for the Court to render a decision before trial filings are due. Those deadlines will not be moved and the Court makes no guarantee that a decision will be final in time to avoid dual tracking.

Dated:

Dated: January 25 2021



Yvonne Gonzalez Rogers
 United States District Court Judge