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 SONICWALL INC.

(Complete list of counsel for Defendant on
 signature page)

9 *Attorneys for Plaintiff*
 10 FINJAN, INC.

11
 12 **UNITED STATES DISTRICT COURT**
 13 **NORTHERN DISTRICT OF CALIFORNIA**
 14 **SAN JOSE DIVISION**

15
 16 FINJAN, INC., a Delaware Corporation,
 17 Plaintiff,
 18 vs.
 19 SONICWALL, INC., a Delaware Corporation,
 20 Defendant.

Case No. 5:17-cv-04467-BLF-HRL

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND DEADLINE**

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Finjan, Inc. (“Finjan”) and Defendant
2 SonicWall, Inc. (“SonicWall”) (collectively, “the Parties”), hereby jointly stipulate and respectfully
3 request that the Court extend the deadline for Finjan to file joint letter briefs to compel discovery
4 pursuant to Civil L.R. 37-3.

5 In support of this stipulated requests, the Parties jointly state as follows:

6 WHEREAS, fact discovery closed on Friday, July 31, 2020;

7 WHEREAS, pursuant to Civil L.R. 37-3, motions to compel must be filed within 7 days of
8 the close of fact discovery;

9 WHEREAS, the Parties met and conferred on Monday, August 3 and Wednesday, August
10 4, 2020 in an effort to resolve discovery disputes related to SonicWall’s Supplemental Initial
11 Disclosures (served July 31, 2020) and SonicWall’s Responses to Finjan’s First Set of Requests for
12 Admission (served July 30, 2020, i.e., 30 days after Finjan served the Requests for Admission per
13 Fed. R. Civ. P. 36(a)(3)). Lead counsel for the Parties met and conferred on Thursday, August 6,
14 2020 pursuant to section 4(b) of Judge DeMarchi’s Standing Order for Civil Cases (“Standing
15 Order”). Despite the Parties’ efforts, they have been unable to resolve all discovery disputes;

16 WHEREAS, Finjan provided SonicWall with two discovery letter briefs at 1 p.m. on
17 Thursday, August 6;

18 WHEREAS, SonicWall is seeking additional time to prepare its portions to the two
19 discovery letter briefs;

20 WHEREAS, the Parties respectfully request that the deadline to file the joint discovery letter
21 briefs be extended from Friday, August 7, 2020 to Monday, August 10, 2020 in order to ensure that
22 “each side has adequate time to prepare its own arguments and address its adversary’s arguments
23 before submission of the letter” (Standing Order, section 4(e));

24 WHEREAS, the requested extension will not affect other case deadlines or delay the case
25 schedule;

26 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among
27 counsel for Finjan and SonicWall that:

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1 1. The deadline to file joint discovery letter briefs to compel discovery shall be
2 extended from August 7, 2020 to August 10, 2020.

3
4
5 Respectfully submitted,

Respectfully submitted,

6 By: /s/Hannah Lee

By: /s/Jennifer H. Forte

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24 Counsel for Defendant
25 SONICWALL, INC.

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ATTESTATION

In compliance with Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: August 7, 2020

/s/ Jennifer H. Forte
Jennifer H. Forte

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 7, 2020 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail and regular mail.

/s/ Jennifer H. Forte _____

Jennifer H. Forte

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