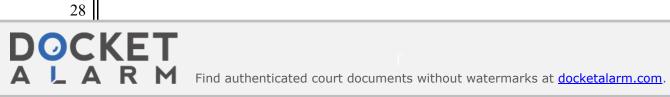
1 2 3 4 5 6 7 8 9	PAUL ANDRE (State Bar No. 196585) pandre@kramerlevin.com LISA KOBIALKA (State Bar No. 191404) lkobialka@kramerlevin.com JAMES HANNAH (State Bar No. 237978) jhannah@kramerlevin.com KRISTOPHER KASTENS (State Bar No. 254797) kkastens@kramerlevin.com HANNAH LEE (State Bar No. 253197) hlee@kramerlevin.com KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800 Attorneys for Plaintiff FINJAN LLC	DUANE MORRIS LLP D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com Nicole E. Grigg (SBN 307733) Email: NEGrigg@duanemorris.com 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Attorneys for Defendant SONICWALL INC. (Complete list of counsel for Defendant on signature page)	
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12	UNITED STATES	DISTRICT COURT	
13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA		
14		E DIVISION	
15	SAN JUST		
16	FINJAN LLC, a Delaware Limited Liability Corporation,	Case No. 5:17-cv-04467-BLF-HRL	
17	Plaintiff,	STIPULATED REQUEST AND	
18	VS.	[PROPOSED] ORDER MODIFYING CASE SCHEDULE	
19	SONICWALL, INC., a Delaware Corporation,		
20	Defendant.		
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Plaintiff Finjan LLC ("Finjan") and Defendant SonicWall, Inc. ("SonicWall") (collectively, "the Parties"), respectfully submit this stipulated request for an order granting a limited enlargement of the current deadlines in light of the upcoming trial in the *Finjan, Inc. v. Cisco Systems, Inc.* case (Case No. 5:17-cv-00072) ("Finjan v. Cisco Trial"), which is scheduled to commence with jury selection on October 16, 2020 and end on October 30, 2020.

WHEREAS, under the current schedule of this case, the Parties' Rebuttal expert reports are due October 5, 2020, and expert discovery closes November 3, 2020 (Dkt. 246);

WHEREAS, five of SonicWall's six expert witnesses in this case and at least five of Finjan's expert witnesses in this case are also experts in the Finjan v. Cisco matter;

WHEREAS, the Parties expect there to be at least 18 days of expert depositions taken in this case;

WHEREAS, jury selection in the Finjan v. Cisco Trial is scheduled to begin nine business days after the Parties serve their respective Rebuttal expert reports, and last until two business days before the close of expert discovery;

WHEREAS, the Parties believe that a short extension of expert discovery deadlines and a related adjustment of the Summary Judgment briefing and hearing schedule is warranted for the limited purposes of (1) avoiding the experts' conflicts with the Finjan v. Cisco Trial schedule, (2) accommodating the subsequent Summary Judgment briefing; and

WHEREAS, the Parties do not wish to inconvenience the Court in any way. As such, the Parties anticipate, based on information available to date, that the proposed extensions below will have no effect on subsequent pre-trial deadlines and scheduled trial date in the Court's case schedule.

SonicWall and Finjan hereby stipulate to, and respectfully request, the following limited extensions to accommodate the needs of the Parties:

Event	Current Deadline	Proposed Deadline
Rebuttal expert reports	October 5, 2020	October 14, 2020



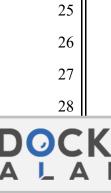
pecenting Summary Judgment effs December 9, 2020 January 6, 2021 January 6, 2021 January 20, 2021 January 10, 2021 January 10, 2021 January 10, 2021				
per sponsive Summary gement Briefs December 9, 2020 January 6, 2021 January 20, 2021 St day to hear dispositive titions all pretrial conference March 18, 2021 May 3, 2021 Dectfully submitted, Self-Paul Andre Andre (SBN 196585) Brie@kramerlevin.com Kobialka (SBN 191404) ialka@kramerlevin.com Bahl Lee (SBN 237978) nah@kramerlevin.com David C. Dotson (Admitted Pro Hac Vice) inceduanemorris.com David C. Dotson (Admitted Pro Hac Vice) phiforte@duanemorris.com DUANE MORRIS LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: 404.253.6900 D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	Close of expert discovery	pert discovery November 3, 2020		
gment Briefs oly Summary Judgment efs at day to hear dispositive tions al pretrial conference All March 18, 2021 May 3, 2021 Dectfully submitted, Sepectfully submitted, By: /s/ Nicole E. Grigg Matthew C. Gaudet (Admitted Pro Hac Vice) megaudet@duanemorris.com David C. Dotson (Admitted Pro Hac Vice) dedotson@duanemorris.com Jennifer H. Forte (Admitted Pro Hac Vice) jihforte@duanemorris.com DUANE MORRIS LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: 404.253.6900 D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	Opening Summary Judgment Briefs	November 20, 2020	December 11, 2020	
st day to hear dispositive tions al pretrial conference All pretrial conference All may 3, 2021 Diagram of the Vice of the Vi	Responsive Summary Judgment Briefs	December 9, 2020	January 6, 2021	
al pretrial conference March 18, 2021 May 3, 2021 May 5, May 6, May	Reply Summary Judgment Briefs	December 23, 2020	January 20, 2021	
meetfully submitted, Respectfully submitted, Mathew C. Gaudet (Admitted Pro Hac Vice) mcgaudet@duanemorris.com DuANE MORRIS LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: 404.253.6900 D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: jingunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	Last day to hear dispositive motions	January 14, 2021	February 10, 2021	
By: /s/Nicole E. Grigg Matthew C. Gaudet (Admitted Pro Hac Vice) mcgaudet@duanemorris.com David C. Dotson (Admitted Pro Hac Vice) mcgaudet@duanemorris.com David C. Dotson (Admitted Pro Hac Vice) dcdotson@duanemorris.com Jennifer H. Forte (Admitted Pro Hac Vice) jhforte@duanemorris.com DuANE MORRIS LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: (650) 752-1700 mimle: (650) 752-1800 Treys for Plaintiff JAN LLC D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com Nicole E. Grigg Matthew C. Gaudet (Admitted Pro Hac Vice) mcgaudet@duanemorris.com Dunke MORRIS LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: 404.253.6900 D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com Nicole E. Grigg Matthew C. Gaudet (Admitted Pro Hac Vice) jhforte@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted Pro Hac Vice) Email: jingunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	Final pretrial conference	March 18, 2021	March 18, 2021	
Ss Paul Andre Andre (SBN 196585) Matthew C. Gaudet (Admitted Pro Hac Vice) mcgaudet@duanemorris.com David C. Dotson (Admitted Pro Hac Vice) dcdotson@duanemorris.com David C. Dotson (Admitted Pro Hac Vice) dcdotson@duanemorris.com Dunke Morris LLP 1075 Peachtree NE, Suite 2000 Atlanta, GA 30309-3929 Telephone: 404.253.6900	Trial	May 3, 2021	May 3, 2021	
nah@kramerlevin.com nah Lee (SBN 253197) @kramerlevin.com AMER LEVIN NAFTALIS & NKEL LLP Marsh Road lo Park, CA 94025 phone: (650) 752-1700 mimile: (650) 752-1800 Trneys for Plaintiff JAN LLC D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com Nicole E. Grigg (SBN 307733) Email: NEGrigg@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	By: <u>/s/Paul Andre</u> Paul Andre (SBN 196585) pandre@kramerlevin.com Lisa Kobialka (SBN 191404) lkobialka@kramerlevin.com James Hannah (SBN 237978)	Matthew C. Gaudet mcgaudet@duanem David C. Dotson (A dcdotson@duanemo Jennifer H. Forte (A	(Admitted <i>Pro Hac Vice</i>) orris.com dmitted <i>Pro Hac Vice</i>) orris.com dmitted <i>Pro Hac Vice</i>) dmitted <i>Pro Hac Vice</i>)	
MNKEL LLP Marsh Road lo Park, CA 94025 phone: (650) 752-1700 imile: (650) 752-1800 may for Plaintiff JAN LLC D. Stuart Bartow (SBN 233107) Email: DSBartow@duanemorris.com Nicole E. Grigg (SBN 307733) Email: NEGrigg@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted Pro Hac Vice) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	jhannah@kramerlevin.com Hannah Lee (SBN 253197) hlee@kramerlevin.com	DUANE MORRIS 1075 Peachtree NE, Atlanta, GA 30309-	LLP Suite 2000 3929	
Email: DSBartow@duanemorris.com Nicole E. Grigg (SBN 307733) Email: NEGrigg@duanemorris.com DUANE MORRIS LLP 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted Pro Hac Vice) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	FRANKEL LLP	, «		
rneys for Plaintiff JAN LLC 2475 Hanover Street Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted Pro Hac Vice) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted Pro Hac Vice) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	Menlo Park, CA 94025 Telephone: (650) 752-1700 Facsimile: (650) 752-1800	Email: DSBartow@ Nicole E. Grigg (SB Email: NEGrigg@d	duanemorris.com BN 307733) uanemorris.com	
JAN LLC Palo Alto, CA 94304-1194 Tel.: 650.847.4150 Fax: 650.847.4151 Joseph A. Powers (Admitted <i>Pro Hac Vice</i>) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted <i>Pro Hac Vice</i>) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	DUANE MORRIS LLP			
Joseph A. Powers (Admitted <i>Pro Hac Vice</i>) Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted <i>Pro Hac Vice</i>) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103	FINJAŇ LLC	Tel.: 650.847.4150	4-1194	
Email: japowers@duanemorris.com Jarrad M. Gunther (Admitted <i>Pro Hac Vice</i>) Email: jmgunther@duanemorris.com DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103			Admitted Pro Hac Vice)	
DUANE MORRIS LLP 30 South 17th Street Philadelphia, PA 19103		Email: japowers@d Jarrad M. Gunther (uanemorris.com Admitted <i>Pro Hac Vice</i>)	
Philadelphia, PA 19103		DUANE MORRIS	LLP	
		Philadelphia, PA 19	103	



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Counsel for Defendant SONICWALL, INC.

Dated: September 22, 2020



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[PROPOSED] ORDER

Pursuant to the Parties' Stipulation, it is hereby ordered that:

Event	Current Deadline	Proposed Deadline
Rebuttal expert reports	October 5, 2020	October 14, 2020
Close of expert discovery	November 3, 2020	November 24, 2020
Opening Summary Judgment Briefs	November 20, 2020	December 11, 2020
Responsive Summary Judgment Briefs	December 9, 2020	January 6, 2021
Reply Summary Judgment Briefs	December 23, 2020	January 20, 2021
Last day to hear dispositive motions	January 14, 2021	February 10, 2021
Final pretrial conference	March 18, 2021	March 18, 2021
Trial	May 3, 2021	May 3, 2021

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JUDGE BETH LABSON FREEMAN United States District Court Judge