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 SONICWALL INC.

(Complete list of counsel for Defendant on
 signature page)

9 *Attorneys for Plaintiff*
 10 FINJAN LLC

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

16 FINJAN LLC, a Delaware Limited Liability
 Corporation,

17 Plaintiff,

18 vs.

19 SONICWALL, INC., a Delaware Corporation,

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

**STIPULATED REQUEST AND
 [PROPOSED] ORDER MODIFYING CASE
 SCHEDULE**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,
 2 “the Parties”), respectfully submit this stipulated request for an order granting a limited enlargement
 3 of the current deadlines in light of the upcoming trial in the *Finjan, Inc. v. Cisco Systems, Inc.* case
 4 (Case No. 5:17-cv-00072) (“Finjan v. Cisco Trial”), which is scheduled to commence with jury
 5 selection on October 16, 2020 and end on October 30, 2020.

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

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

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

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

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

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

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

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Rebuttal expert reports	October 5, 2020	October 14 , 2020

1	Close of expert discovery	November 3, 2020	November 24, 2020
2	Opening Summary Judgment Briefs	November 20, 2020	December 11, 2020
3			
4	Responsive Summary Judgment Briefs	December 9, 2020	January 6, 2021
5	Reply Summary Judgment Briefs	December 23, 2020	January 20, 2021
6			
7	Last day to hear dispositive motions	January 14, 2021	February 10, 2021
8	Final pretrial conference	March 18, 2021	March 18, 2021
9	Trial	May 3, 2021	May 3, 2021
10			

11 Respectfully submitted,

Respectfully submitted,

12
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Dated: September 22, 2020

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[PROPOSED] ORDER

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

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
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
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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

IT IS SO ORDERED.

Dated: _____

 JUDGE BETH LABSON FREEMAN
 United States District Court Judge