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9 FINJAN LLC

Attorneys for Defendant  
SONICWALL, INC.

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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION  
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15 FINJAN LLC., a Delaware Limited Liability  
16 Company,

17 Plaintiff,

18 v.

19 SONICWALL, INC., a Delaware  
20 Corporation,

21 Defendant.  
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Case No. 5:17-cv-04467-BLF (VKD)

**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 present time constraints between the current deadlines,  
4 discovery demands, and the upcoming trial in the *Finjan, Inc. v. Cisco Systems, Inc.* case (Case No.  
5 5:17-cv-00072) (“Finjan v. Cisco Trial”).

6 WHEREAS, under the current schedule of this case, expert discovery closes November 3,  
7 2020 (Dkt. 298), and the Parties have collectively scheduled seventeen expert depositions between  
8 October 20, 2020 and November 3, 2020.

9 WHEREAS, in response to SonicWall’s Motion to Strike New Theories in Finjan’s Expert  
10 Reports, Finjan’s Opposition Brief is due October 28, 2020, and Sonic Wall’s Reply Brief is due on  
11 November 4, 2020;

12 WHEREAS, the Finjan v. Cisco Trial is scheduled to commence with jury selection on  
13 November 2, 2020 and end on November 13, 2020;

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

16 WHEREAS, the Parties have agreed that a short extension of the Motions briefing and  
17 Summary Judgment briefing is mutually beneficial for the limited purposes of avoiding conflicting  
18 time constraints between (1) the close of expert discovery, including the scheduled expert  
19 depositions, (2) the Motions briefing, (3) the Finjan v. Cisco Trial schedule, and (4) the subsequent  
20 Summary Judgment briefing; and

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

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

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Event	Current Deadline	Proposed Deadline
Finjan's Opposition to Motion to Strike New Theories in Finjan's Expert Reports	October 28, 2020	November 24, 2020
Close of expert discovery	November 3, 2020	No Change
SonicWall's Reply in Support of Motion to Strike New Theories in Finjan's Expert Reports	November 4, 2020	December 23, 2020
Opening Summary Judgment Briefs	November 20, 2020	December 2, 2020
Responsive Summary Judgment Briefs	December 9, 2020	December 21, 2020
Reply Summary Judgment Briefs	December 23, 2020	December 31, 2020
Last day to hear dispositive motions	January 14, 2021	No Change
Tentative hearing on SonicWall's Motion to Strike New Theories in Finjan's Expert Reports	March 11, 2021	No Change
Final pretrial conference	March 18, 2021	No Change
Trial	May 3, 2021	No Change

Respectfully submitted,

By: /s/ Jason W. Wolff  
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*Attorneys for Defendant*  
*SONICWALL, INC.*

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5 Dated: October 21, 2020  
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**[PROPOSED] ORDER**

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

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Finjan's Opposition to Motion to Strike New Theories in Finjan's Expert Reports	October 28, 2020	November 24, 2020
Close of expert discovery	November 3, 2020	No Change
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Trial	May 3, 2021	No Change

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
**JUDGE BETH LABSON FREEMAN**  
 United States District Court Judge