

1 Juanita R. Brooks (CA SBN 75934)
brooks@fr.com
2 Jason W. Wolff (CA SBN 215819)
wolff@fr.com
3 FISH & RICHARDSON P.C.
4 12860 El Camino Real, Ste. 400
San Diego, CA 92130
5 Tel.: (858) 678-5070
Fax: (858) 678-5099
6

DUANE MORRIS LLP
D. Stuart Bartow (SBN 233107)
Email: DS Bartow@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

7 *Additional counsel listed on
signature page*

*Additional counsel listed on
signature page*

8 Attorneys for Plaintiff
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)

**JOINT MOTION AND ~~PROPOSED~~ ORDER
TO EXTEND TIME FOR SUBMISSION OF
DEPOSITION DESIGNATIONS**

1 Plaintiff Finjan LLC (“Finjan”) and Defendant SonicWall, Inc. (“SonicWall”) (collectively,
2 “the Parties”), respectfully move the Court to extend the time by which the Parties are required to
3 submit deposition designations.

4 Trial in this matter is scheduled to begin on Monday, May 3, 2021, and the final pretrial
5 conference is set for Thursday, March 18, 2021. D.I. 48. The Court’s Standing Order requires the
6 Parties to submit a Joint Pretrial Statement and Order in this matter by March 4, 2021, at least 14
7 days before the final pretrial conference. The Court’s Standing order also requires the Joint Pretrial
8 Statement and Order to include “deposition excerpts to be offered at trial.” In order to reduce the
9 likelihood of the Parties designating, responding to, and objecting to deposition testimony that may
10 become superfluous as the Parties crystallize their respective trial strategies, the Parties respectfully
11 request that Court permit deposition designations in this matter to be exchanged as follows:
12

- 13 • The Parties shall exchange opening deposition designations two weeks prior to the
14 first day of trial (presently April 19, 2021);
- 15 • The Parties shall exchange counter-designations and objections to opening;
16 designations four calendar days after opening designations are exchanged (presently
17 April 23, 2021); and
- 18 • The Parties shall exchange objections to counter-designations four calendar days
19 after counter-designations are exchanged (presently April 27, 2021).

20 The Parties submit that the requested procedure for deposition designations will not impact
21 the Court’s scheduled trial date or the resolution of any outstanding objections prior to trial, per the
22 Court’s Standing Order for Civil Trials.
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1 Respectfully submitted,

Respectfully submitted,

2 By: /s/ Proshanto Mukherji
3 Juanita R. Brooks (CA SBN 75934)
4 brooks@fr.com
5 Jason W. Wolff (CA SBN 215819)
6 wolff@fr.com
7 FISH & RICHARDSON P.C.
8 12860 El Camino Real, Ste. 400
9 San Diego, CA 92130
10 Telephone: (858) 678-5070

By: /s/ Alice Snedeker
Matthew C. Gaudet (*Pro Hac Vice*)
mcgaudet@duanemorris.com
David C. Dotson (*Pro Hac Vice*)
dcdotson@duanemorris.com
Jennifer H. Forte (*Pro Hac Vice*)
jhforte@duanemorris.com
Alice E. Snedeker (*Pro Hac Vice*)
aesnedeker@duanemorris.com
DUANE MORRIS LLP
1075 Peachtree NE, Suite 2000
Atlanta, GA 30309-3929
Telephone: 404.253.6900

11 Proshanto Mukherji (*Pro Hac Vice*)
12 mukherji@fr.com
13 FISH & RICHARDSON P.C.
14 One Marina Park Drive
15 Boston, MA 02210
16 Telephone: (617) 542-5070

D. Stuart Bartow (SBN 233107)
Email: DS Bartow@duanemorris.com
Nicole E. Grigg (SBN 307733)
Email: NEGrigg@duanemorris.com
DUANE MORRIS LLP
2475 Hanover Street
Palo Alto, CA 94304-1194
Telephone: 650.847.4150

17 Robert Courtney (CA SNB 248392)
18 courtney@fr.com
19 FISH & RICHARDSON P.C.
20 3200 RBC Plaza
21 60 South Sixth Street
22 Minneapolis, MN 55402
23 Telephone: (612) 335-5070

Joseph A. Powers (*Pro Hac Vice*)
Email: japowers@duanemorris.com
Jarrad M. Gunther (*Pro Hac Vice*)
Email: jmgunther@duanemorris.com
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103
Telephone: 215.979.1000

24 *Attorneys for Plaintiff*
25 *FINJAN LLC*

Attorneys for Defendant
SONICWALL, INC.

26 Dated: February 1, 2021

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[PROPOSED] ORDER

Pursuant to Parties' Stipulated Request, the schedule is changed as follows:

Event	Current Deadline	New Deadline
Deadline to file Joint Pretrial Statement & Order (excluding deposition designations)	March 4, 2021	No change
Final pretrial conference	March 18, 2021	No change
Exchange opening deposition designations	March 4, 2021	two weeks before start of trial (presently April 19, 2021)
Exchange counter-designations and objections to opening designations	March 4, 2021	four calendar days after opening designations (presently April 23, 2021)
Deadline to file pretrial briefs	April 26, 2021	No change
Objections to counter-designations	March 4, 2021	four calendar days after counter-designations (presently April 27, 2021)
Trial	May 3, 2021	No change

IT IS SO ORDERED.

Dated: February 2, 2021



 JUDGE BETH LABSON FREEMAN
 United States District Court Judge