

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GODO KAISHA IP BRIDGE 1,	§	
	§	
<i>Plaintiff,</i>	§	
	§	CIVIL ACTION NO. 1:16-cv-00290-SLR
v.	§	
	§	JURY TRIAL DEMANDED
OMNIVISION TECHNOLOGIES, INC.,	§	
	§	
<i>Defendant.</i>	§	

**STIPULATION AND ORDER FOR EXTENSION OF TIME AND VENUE DISCOVERY**

WHEREAS on May 16, 2016, Defendant OmniVision Technologies, Inc. (“OmniVision” or “Defendant”) filed a Motion to Transfer Venue to the Northern District of California [D.I. 10-13] (“Motion to Transfer”);

WHEREAS Plaintiff Godo Kaisha IP Bridge 1’s (“IP Bridge” or “Plaintiff”) Opposition to the Motion to Transfer is currently due on June 3, 2016. [D.I. 11];

WHEREAS OmniVision and IP Bridge (collectively “the parties”) have agreed to conduct early discovery relating only to venue and OmniVision’s Motion to Transfer as follows:

1. Within two business days of entry of the Court’s Scheduling Order, IP Bridge will serve its venue discovery requests on OmniVision; and
2. OmniVision will respond to IP Bridge’s venue discovery requests within fifteen (15) days of being served with those requests;

WHEREAS the parties agree that all other discovery and initial disclosures (with the exception of the disclosures required under Fed. R. Civ. Pro. 7.1) shall be stayed pending a decision from the Court ruling on OmniVision’s Motion to Transfer;

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WHEREAS the parties further agree to stipulate to an extension of time for IP Bridge to file its Opposition to OmniVision's Motion to Transfer until fifteen (15) days after OmniVision responds to IP Bridge's venue discovery requests, if IP Bridge does not file a motion to compel relating to the venue discovery by the 15th day after OmniVision provides its responses; and

WHEREAS OmniVision reserves the right to seek venue discovery upon receipt of IP Bridge's Opposition to OmniVision's Motion to Transfer and to seek an extension of time to file its reply until fifteen (15) days after IP Bridge responds to OmniVision's venue discovery requests;

WHEREAS the parties further agree that OmniVision's reply on the Motion to Transfer will be due within fifteen (15) days of IP Bridge's Opposition, if OmniVision does not serve venue discovery requests on IP Bridge.

IT IS HEREBY STIPULATED, by and between Plaintiff and Defendant in the above-referenced actions, through their undersigned counsel and subject to the approval of the Court, that:

1. IP Bridge may conduct early discovery relating only to venue and OmniVision's Motion to Transfer and that within two business days of entry of the Court's Scheduling Order, IP Bridge will serve its venue discovery requests on OmniVision;
2. OmniVision will respond to IP Bridge's venue discovery requests within fifteen (15) days of being served with those requests;
3. All other discovery and initial disclosures (with the exception of the disclosures required under Fed. R. Civ. Pro. 7.1) shall be stayed pending a decision from the Court ruling on OmniVision's Motion to Transfer;

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4. IP Bridge's deadline to file its Opposition to OmniVision's Motion to Transfer is extended until fifteen (15) days after OmniVision responds to IP Bridge's venue discovery requests, if IP Bridge does not file a motion to compel relating to the venue discovery by the 15th day after OmniVision provides its responses; and
5. OmniVision shall have the right to seek venue discovery upon receipt of IP Bridge's Opposition to OmniVision's Motion to Transfer and to seek an extension of time to file its reply until fifteen (15) days after IP Bridge responds to OmniVision's venue discovery requests;
6. OmniVision's reply on the Motion to Transfer is due within fifteen (15) days of IP Bridge's Opposition, if OmniVision does not serve venue discovery requests on IP Bridge.

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SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
United States District Judge

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