

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MOSAID TECHNOLOGIES INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 11-698-GMS
)	
ADOBE SYSTEMS, INC.; ALCATEL-)	
LUCENT USA, INC.; INTERNATIONAL)	
BUSINESS MACHINES CORP.; JUNIPER)	
NETWORKS, INC.; NETAPP, INC.; RED)	
HAT, INC.; AND VMWARE, INC.;)	
)	
Defendants.)	

STIPULATION AND ORDER

WHEREAS, defendants VMware, Inc., Red Hat, Inc., International Business Machines Corp., Adobe Systems, Inc., Juniper Networks, Inc., and Alcatel-Lucent USA, Inc. each filed motions to dismiss for failure to state a claim (collectively, the “Pleading Sufficiency Motions”);

WHEREAS, defendant VMware, Inc. also filed a Motion to Dismiss for Lack of Jurisdiction over the Subject Matter (the “Standing Motion”) and defendant Juniper Networks, Inc. filed a motion to transfer venue to the Northern District of California, combined with its Pleading Sufficiency Motion (the “Transfer Motion”);

WHEREAS the parties previously agreed to, and the Court granted, (1) a modification of the briefing in this matter to permit Plaintiff to submit an omnibus brief responding to defendants Pleading Sufficiency Motions; and (2) an extension of time for Plaintiff to file its omnibus answering brief, as well as answering briefs in opposition to defendant Juniper Networks, Inc.’s Transfer Motion and VMware, Inc.’s Standing Motion;

WHEREAS, in order to permit the defendants to seek to coordinate on a joint reply brief in support of their Pleading Sufficiency Motions, and due to scheduling issues of counsel, the parties have further agreed to an extension of time for Defendants to file their reply briefs;

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the approval of the Court, that:

1. Defendants' reply briefs in support of their Pleading Sufficiency Motions shall be filed on or before January 30, 2012;

2. Juniper Networks, Inc.'s reply brief in support of its Transfer Motion shall be filed on or before January 30, 2012; and

3. VMware, Inc.'s reply brief in support of its Standing Motion shall be filed on or before February 9, 2012.

BAYARD, P.A.

/s/ Stephen B. Brauerman

Richard D. Kirk (No. 922)
Stephen B. Brauerman (No. 4952)
222 Delaware Avenue, Suite 900
Wilmington, Delaware 19801
(302) 655-5000
rkirk@bayardlaw.com
sbrauerman@bayardlaw.com

Counsel for Plaintiff Mosaid Technologies Inc.

SEITZ ROSS ARONSTAM & MORITZ LLP

/s/ Collins J. Seitz, Jr.

Collins J. Seitz, Jr. (No. 2237)
100 S. West Street, Suite 400
Wilmington, DE 19801
(302) 576-1600
cseitz@seitzross.com

*Counsel for Defendant Int'l Business
Machines Corp. and Juniper Networks, Inc.*

YOUNG CONAWAY STARGATT
& TAYLOR, LLP

/s/ Pilar G. Kraman

Adam W. Poff (No. 3990)
Pilar G. Kraman (No. 5199)
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
apoff@ycst.com
pkraman@ycst.com

Counsel for Defendant VMware, Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (No. 1014)
Paul Saindon (No. 5110)
1201 North Market Street
Wilmington, DE 19801
(302) 658-9200
jblumenfeld@mnat.com
psaindon@mnat.com

Counsel for Defendant Alcatel-Lucent USA, Inc.

FISH & RICHARDSON P.C.

DLA PIPER LLP (US)

/s/ Gregory R. Booker
Tara D. Elliott (No. 4483)
Gregory R. Booker (No. 4784)
222 Delaware Avenue, 17th Floor
Wilmington, DE 19801
(302) 652-5070
tde@fr.com
booker@fr.com

/s/ Denise S. Kraft
Denise S. Kraft (No. 2778)
Aleine Porterfield (No. 5053)
919 North Market St., Suite 1500
Wilmington, DE 19801
(302) 468-5700
denise.kraft@dlapiper.com
aleine.porterfield@dlapiper.com

Counsel for Defendant Red Hat Inc.

Attorneys for Defendant Adobe Systems, Inc.

SO ORDERED, this ____ day of January, 2012.

United States District Judge