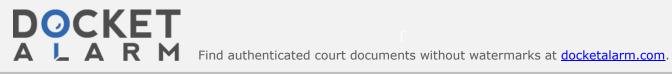
- 1			
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17	UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA		
	FOR THE CENTRAL D	ISTRICT OF CALIFORNIA	
18	BLACKBERRY LIMITED,	Case No. 2:19-cv-01444-GW-KS	
19	a Canadian corporation,		
20	Plaintiff,	JOINT STIPULATION AND REQUEST TO STAY	
21	v.	PROCEEDINGS	
22	TWITTER, INC.,		
23	a Delaware corporation,		
24	Defendant.		
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WHEREAS, on June 4, 2019, Plaintiff BlackBerry Limited ("Blackberry") filed a First Amended Complaint, Docket No. 36;

WHEREAS, on June 25, 2019, Defendant Twitter, Inc. ("Twitter") filed a Motion to Dismiss the First Amended Complaint, Docket No. 39;

WHEREAS, on October 2, 2019, the Court entered a Final Ruling on Twitter's Motion to Dismiss, Docket No. 51, dismissing BlackBerry's claims related to U.S. Patent Nos. 8,676,929 (Count I), 8,296,351 (Count II), 8,572,182 (Count VI), and 8,825,777 (Count VII);

WHEREAS, on October 31, 2019, Twitter filed its Answer and Counterclaims with respect to BlackBerry's claims related to U.S. Patent Nos. 9,349,120, 9,021,059, and 8,286,089, Docket No. 54, while BlackBerry filed a Notice of Voluntary Dismissal of BlackBerry's claims related to the same three patents under Fed. R. Civ. P. 41(a)(1), Docket No. 55, and these filings may raise legal issues that could require Court resolution absent agreement by the parties;

WHEREAS, the parties agree that there has been no final judgment under Rule 58(a) of the Federal Rules of Civil Procedure, and that the 30-day time period to file a notice of appeal will commence only upon entry of such a final judgment;

WHEREAS, the parties have commenced settlement discussions in an attempt to resolve this and any other potential action involving assertion of patent rights between the parties, and are in mutual agreement that a stay of these proceedings would be beneficial while the parties engage in these discussions;

WHEREAS, the parties therefore have agreed to a stay of these proceedings and any new action involving assertion of patent rights against each other, effective as of the filing date of this stipulation and continuing through January 6, 2020 (the "Standstill Period").

It is hereby STIPULATED and AGREED by and between the parties that:

All proceedings in this action are stayed and all deadlines, including 1. 28 deadlines arising under the Federal Rules of Civil Procedure and Federal Rules of



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Appellate Procedure, either have not triggered or, if they have been triggered, are tolled for the Standstill Period;

- 2. During this Standstill Period, neither party will make further filings with the Court (apart from a motion to modify the Court's Order on the Joint Stipulation and Request to Stay Proceedings) in this action or initiate any new action involving assertion of patent rights against each other;
- The parties request that, apart from entering an Order on this Joint 3. Stipulation and Request to Stay Proceedings, the Court take no further action as to any issues pending before or during the Standstill Period, and that it defer entering a final judgment; and
- After the expiration of this Standstill Period, the parties may pursue any 4. and all rights and remedies available under the law in this or any other potential action between the parties; and for the avoidance of any doubt, the parties expressly reserve all rights and remedies, and expressly agree to no waiver of any deadlines.

IT IS SO STIPULATED.



1	Dated: November 11, 2019	Respectfully Submitted,
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DOCKET

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