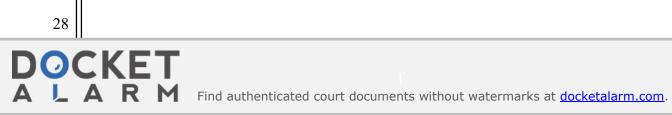
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|--|---|--|--|--|
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| Attorneys for Defendant QUALYS INC.  UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA   |   |  |  |  |
| OAKLAND DIVISION   |   |  |  |  |
| FINJAN LLC,  Plaintiff,  v.  QUALYS INC.,  Defendant.  | Case No.: 4:18-cv-07229-YGR  STIPULATION AND {PROPOSED} ORDER TO EXTEND DEADLINES *As Modified by the Court * Date Complaint Filed: November 29, 2018  Trial Date: None Set   |  |  |  |
|  | NORTHERN DISTROAKLAN  OAKLAN  FINJAN LLC,  Plaintiff,  v.  QUALYS INC.,   |  |  |  |



DOCKET

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Finjan LLC ("Finjan") and Defendant Qualys Inc. ("Qualys") (collectively, "the Parties"), hereby jointly stipulate and respectfully request that the Court amend the case schedule.

In support of these stipulated requests, the Parties jointly state as follows:

WHEREAS, one of Qualys's attorneys will be undergoing surgery and will need some time to recover before taking expert depositions, the parties have conferred and agreed that, subject to the Court's approval, the case schedule should be amended as set forth below in order to account for the recovery of Qualys's attorney;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among counsel for Finjan and Qualys that the deadlines set forth below be amended as follows:

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| Event   | Previous Date   | Agreed Proposed<br>Date/Deadline               |
|---|---|--|
| Close of expert discovery   | 1 month after the service of rebuttal expert reports                              | March 5, 2021 (changed from February 12, 2021) |
| Last day for a pre-filing conference on summary judgment motions  | three weeks after the close of expert discovery                                   | March 26, 2021 (changed from March 5, 2021)    |
| Plaintiff's opening summary judgment briefs   | three weeks after the pre-<br>filing conference on<br>summary judgment<br>motions | No change                                      |
| Defendant's opposition summary judgment briefs and cross motion for summary judgment                      | three weeks after Plaintiff's opening summary judgment brief                      | No change                                      |
| Plaintiff's reply summary judgment briefs and opposition to Defendant's cross motion for summary judgment | three weeks after<br>Defendant's opposition<br>summary judgment brief             | No change                                      |
| Defendant's reply for its cross<br>motion for summary judgment  | three weeks after<br>Plaintiff's opposition<br>summary judgment brief             | No change                                      |
| Summary judgment hearing  | Subject to the Court's availability   | No change                                      |
| Final Pretrial Conference   | Subject to the Court's availability   | No change                                      |
| Trial   | Subject to the Court's availability   | No change                                      |

Dated: January 22, 2021 /s/ Jason W. Wolff

Jason W. Wolff (CA SBN 215819) wolff@fr.com

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CONTROL ADVIOLATION AND EDUCATED ADDED

CACE NO 410 07000 WOR



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Dated: January 22, 2021 /s/ Ryan R. Smith Ryan R. Smith (SBN 229323) rsmith@wsgr.com WILSON SONSINI GOODRICH & ROSATI **Professional Corporation** 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 493-6811 **ATTESTATION** In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document /s/ Ryan R. Smith Ryan R. Smith 



## 

Dated: January 25 2021

## As Modified by the Court [PROPOSED] ORDER

Pursuant to the parties' Stipulation, it is hereby ordered that the deadlines set forth below are extended as follows:

| Event  | Amended Deadline |
|--|------------------|
| Close of expert discovery  | March 5, 2021    |
| Last day for a pre-filing conference on summary judgment motions | March 26, 2021   |

PURSUANT TO STIPULATION, IT IS SO ORDERED with following caveat: Parties are advised that by seeking to move the dates relative to any summary judgment motion, they are effectively eliminating three weeks for the Court to render a decision before trial filings are due. Those deadlines will not be moved and the Court makes no guarantee that a decision will be final in time to avoid dual tracking.

Yvonne Gonzalez Rogers

United States District Court Judge

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