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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

BROADCOM CORPORATION,

Plaintiff,

v.

NXP SEMICONDUCTORS N.V., NXP B.V., & NXP SEMICONDUCTORS USA, INC.,

Defendants.

NXP SEMICONDUCTORS N.V., NXP B.V., & NXP SEMICONDUCTORS USA, INC.,

Counter-plaintiffs,

v.

BROADCOM CORPORATION,

Counter-defendant.

Case No. SACV13-829-MRP-MAN

DEFENDANTS NXP SEMICONDUCTORS N.V. AND NXP B.V.'S NOTICE OF MOTION AND MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

Date: November 18, 2013
Time: 11:00 a.m.
Place: Courtroom 12
Judge: Honorable Mariana R. Pfaelzer

NOTICE OF MOTION AND MOTION TO DISMISS

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on November 18, 2013, at 11:00 a.m., or as soon thereafter as this matter may be heard in the Courtroom of the Honorable Mariana R. Pfaelzer, United States District Judge, Central District of California, Western Division, located at 312 N. Spring Street, Courtroom 12, Los Angeles, California 90012, Defendants NXP SEMICONDUCTORS N.V. and NXP B.V., by and through their counsel, will and hereby do move the Court for an order dismissing the above-captioned action against them for lack of personal jurisdiction. This motion is made following multiple conferences of counsel pursuant to L.R. 7-3, which took place on August 28 during the Rule 26(f) Conference, on September 19 at the Case Management Conference, and again on September 23 and September 27. The parties were unable to reach an agreement.

This motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities filed herewith, the declaration of Dr. Jean. A.W. Schreurs filed herewith, and all papers, pleadings, documents, arguments of counsel, and other materials presented before or during the hearing on this motion, and any other evidence and argument the Court may consider.

Respectfully submitted,

September 27, 2013

By */s/ Mark D. Rowland*

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2013, I electronically filed the foregoing documents described as:

DEFENDANTS NXP SEMICONDUCTORS N.V. AND NXP B.V.'S NOTICE OF MOTION AND MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF NXP SEMICONDUCTORS N.V. AND NXP B.V.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

DECLARATION OF DR. JEAN A. W. SCHREURS IN SUPPORT OF DEFENDANTS NXP SEMICONDCUTORS N.V. AND NXP B.V.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION (EXHIBITS 1-3)

[PROPOSED] ORDER TO GRANT DEFENDANTS NXP SEMICONDUCTORS N.V. AND NXP B.V.'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION

with the Clerk of the Court by using the CM/ECF System which will transmit a notice of electronic filing to counsel for Broadcom Corporation as follows:

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