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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DR. MICHAEL JAFFÉ
in his capacity as Insolvency Administrator over the assets of
QIMONDA AG

Plaintiff,

v.

MAGNACHIP SEMICONDUCTOR CORP., MAGNACHIP SEMICONDUCTOR, INC., MAGNACHIP SEMICONDUCTOR S.A., MAGNACHIP SEMICONDUCTOR, LTD.

Defendants.

Case No. 12-CV-03166-JST

JOINT MOTION TO CONTINUE CASE MANAGEMENT CONFERENCE AND CERTAIN DEADLINES

Plaintiff Dr. Michael Jaffé, in his capacity as Insolvency Administrator over the assets of Qimonda AG ("Plaintiff"), and Defendants MagnaChip Semiconductor Corporation, MagnaChip Semiconductor, Inc., MagnaChip Semiconductor S.A., and MagnaChip Semiconductor, Ltd. (collectively "MagnaChip") hereby respectfully request a continuance of the Case Management Conference and certain deadlines by about four weeks, as set forth below. The parties remain diligently engaged in settlement discussions and believe that a postponement would be beneficial so that the parties can continue their discussions with the goal of reaching an amicable settlement. The settlement discussions have taken longer than anticipated (the parties and their counsel span three continents), and the parties are hopeful that this continuance will be the last, and that it will provide them with sufficient time to resolve their settlement discussions. The parties greatly appreciate the Court's patience in this regard.

WHEREFORE, based upon the foregoing, the parties respectfully request that the Court grant this "Joint Motion to Continue Case Management Conference and Certain Deadlines" and:

- Postpone the Case Management Conference until June 19, 2013 (from May 28, 2013 per Dkt. No 229);
- Postpone the deadline for Plaintiff's Opening Claim Construction Brief until June 21, 2013 (from May 24, 2013 per Dkt. No. 229);
- Postpone the deadline for Defendants' Responsive Claim Construction Brief until June 28, 2013 (from June 8, 2013 per Dkt. No. 229);
- Postpone the deadline for Plaintiff's Claim Construction Reply Brief until July 8, 2013 (from June 15, 2013 per Dkt. No. 229);
- Postpone the deadline to complete claim-construction discovery until July 30, 2013 (from July 2, 2013 per Dkt. No. 229);
- Postpone the Claim Construction Tutorial until ~~August 5, 2013~~ August 6, 2013 at 9:30 a.m. (from July 2, 2013 per Dkt. No. 229); and

August 6, 2013 at 1:00 p.m.

- Postpone the Markman Hearing until ~~August 5, 2013~~ (from July 2, 2013 per Dkt. No. 229).

Respectfully submitted this 16th day of May 2013.

The court will not grant any further continuances on the basis of continuing settlement discussions.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
IT IS SO ORDERED AS MODIFIED
Judge Jon S. Tigar

Dated: May 20, 2013

/s/ Robert Whitman
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MAGNACHIP SEMICONDUCTOR S.A., AND
MAGNACHIP SEMICONDUCTOR, LTD.

ATTESTATION OF CONCURRENCE

I, Robert Whitman, am the ECF User whose ID and password are being used to file this "Joint Motion to Continue Case Management Conference and Certain Deadlines." In compliance with Civil Local Rules 5-1, I hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: May 16, 2013

By: */s/ Robert Whitman*
Robert Whitman