IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORACLE CORPORATION and ORACLE U.S.A. INC.,	)	
Plaintiffs,	)	
v.	)	C.A. No. 06-414 (SLR)
EPICREALM LICENSING, LP,	)	
Defendant.	)	
AND RELATED COUNTERCLAIMS	)	

STIPULATED AMENDMENT TO JOINT DISCOVERY PLAN
AND SCHEDULING ORDER

WHEREAS, the Court entered a Joint Discovery Plan and Scheduling Order (D.I. 29) in this matter on May 16, 2007;

WHEREAS, the parties agree that an extension of certain discovery deadlines is necessary to complete discovery in this matter;

WHEREAS, the proposed extension will not require changes to any dispositive motion deadlines, hearing dates, or trial dates;

WHEREAS, the parties have agreed that:

(i) the fact discovery cutoff is extended to March 31, 2008 for party and third-party depositions already noticed and Rule 26 supplementation;

(ii) for those depositions that cannot be scheduled before March 31, 2008, the parties will specifically identify depositions (already noticed but not yet scheduled) that fall into this category, and exchange proposed dates as

soon as possible. The parties may supplement, where necessary, expert reports based on any such depositions;

(iii) expert reports on issues for which the parties have the burden of proof will be due on April 30, 2008; rebuttal expert reports will be due on May 30, 2008;

(iv) the date for completion of expert discovery will be extended to June 20, 2008;

(v) joint claim construction statement is due June 30, 2008; and

(vi) Daubert motions are due July 24, 2008.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that the Joint Discovery Plan and Scheduling Order (D.I. 29) be amended as follows:

	Schedule Item	**Old Deadline**	**New Deadline**
1.	Close of fact discovery	February 29, 2008	March 31, 2008
2.	Supplementations under Rule 26(e)	February 29, 2008	March 31, 2008
3.	Expert reports on issues for which the parties have the burden of proof	March 28, 2008	April 30, 2008
4.	Rebuttal expert reports	April 25, 2008	May 30, 2008
5.	Completion of expert discovery	June 6, 2008	June 20, 2008
6.	Joint claim construction statement	June 13, 2008	June 30, 2008
7.	Daubert motions	July 8, 2008	July 24, 2008

All remaining dates on the Joint Discovery Plan and Scheduling Order shall remain unchanged.

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SO ORDERED this _____ day of _____, 2008.

_____
U.S.D.J.