IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. ASUSTEK COMPUTER INC., ASUS COMPUTER INTERNATIONAL, Defendant.	C.A. No. 15-1125-GMS JURY TRIAL DEMANDED
KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. HTC CORP., HTC AMERICA, Defendants.	C.A. No. 15-1126-GMS JURY TRIAL DEMANDED
KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. VISUAL LAND INC. Defendants.	C.A. No. 15-1127-GMS JURY TRIAL DEMANDED

KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. SOUTHERN TELECOM, INC., Defendant.	C.A. No. 15-1128-GMS JURY TRIAL DEMANDED
KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. DOUBLE POWER TECHNOLOGY, INC., ZOWEE MARKETING CO., LTD., SHENZEN ZOWEE TECHNOLOGY CO., LTD., Defendants.	C.A. No. 15-1130-GMS JURY TRIAL DEMANDED
KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. YIFANG USA, INC. D/B/A E-FUN, INC., Defendant.	C.A. No. 15-1131-GMS JURY TRIAL DEMANDED

KONINKLIJKE PHILIPS N.V., U.S. PHILIPS CORPORATION, Plaintiffs, v. ACER INC., ACER AMERICA CORPORATION, Defendants.	)	C.A. No. 15-1170-GMS JURY TRIAL DEMANDED

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

WHEREAS, Defendants in Civil Action Nos. 15-1125-GMS, 15-1126-GMS, 15-1127-GMS, 15-1128-GMS, 15-1131-GMS and 15-1170-GMS have each filed a Joint Motion to Dismiss for Improper Venue (collectively, the "Venue MTD") and a Motion to Dismiss for Failure to State a Claim (collectively, the "Rule 12(b)(6) MTD");

WHEREAS, the Defendants in Civil Action No. 15-1130-GMS have yet to respond to the Complaint in that action;

WHEREAS, Plaintiffs intend to file First Amended Complaints in each of the above-captioned actions in an effort to resolve the issues raised in the Rule 12(b)(6) MTD;

WHEREAS, Plaintiffs and Defendants are in agreement that the Venue MTD and Rule 12(b)(6) MTD issues in the above-captioned actions should be resolved in a coordinated fashion; and

WHEREAS, Plaintiffs require additional time to prepare their First Amended Complaints and opposition to the Venue MTD;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that:

1. Plaintiffs shall have an extension of time until April 11, 2016 to file First Amended Complaints in the above-captioned actions as a matter of right and without the need to file motions seeking leave to amend;

2. Upon the filing of Plaintiffs' First Amended Complaints, Defendants Rule 12(b)(6) MTD shall be deemed withdrawn without prejudice, and Defendants shall respond to the First Amended Complaint in the manner they deem appropriate including but not limited to renewing some or all of the original 12(b)(6) MTD or raising an entirely new motion on different grounds;

3. Defendants Double Power Technology, Inc., Zowee Marketing Co., Ltd., and Shenzen Zowee Technology Co., Ltd. in C.A. No. 15-1130 need not respond to the Original Complaint but instead shall answer, move or otherwise respond to the First Amended Complaint in the manner they deem appropriate; and

4. Plaintiffs shall have an extension of time until April 11, 2016 to file their opposition to the Venue MTD.

McCARTER & ENGLISH, LLP

/s/ Daniel M. Silver
Michael P. Kelly (#2295)
Daniel M. Silver (#4758)
Benjamin A. Smyth (#5528)
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, Delaware 19801
(302) 984-6300
mkelly@mccarter.com
dsilver@mccarter.com
bsmyth@mccarter.com

Michael P. Sandonato
John D. Carlin
Daniel A. Apgar
Jonathan M. Sharret
FITZPATRICK, CELLA, HARPER & SCINTO
1290 Avenue of the Americas
New York, New York 10104-3800
Tel: (212) 218-2100
Fax: (212) 218-2200
msandonato@fchs.com
jcarlin@fchs.com
dapgar@fchs.com
jsharret@fchs.com

Attorneys for Plaintiffs

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith II
Rodger D. Smith II (#3778)
Eleanor G. Tennyson (#5812)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
rsmith@mnat.com
etennyson@mnat.com

Michael J. Newton
Derek Neilson
Sang (Michael) Lee
ALSTON & BIRD LLP
2828 N. Harwood Street, Suite 1800
Dallas, TX 75201-2139

Patrick J. Flinn
ALSTON & BIRD LLP
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309-3424

Xavier M. Brandwajn
ALSTON & BIRD LLP
1950 University Avenue, 5th Floor
East Palo Alto, CA 94303

Attorneys for Defendants Asustek Coumputer Inc. and Asus Computer International

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Samantha G. Wilson
Anne Shea Gaza (#4093)
Samantha G. Wilson (# 5816)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
agaza@ycst.com
swilson@ycst.com

Elizabeth Rogers Brannen
STRIS & MAHER, LLP
725 South Figueroa Street, Suite 1830
Los Angeles, CA 90017
(213) 995-6809
elizabeth.brannen@strismaher.com

Attorneys for Defendant
Visual Land Inc.

SHAW KELLER LLP

/s/ David M. Fry
John W. Shaw (# 3362)
Karen E. Keller (# 4489)
Andrew E. Russell (# 5382)
David M. Fry (#5486)
300 Delaware Avenue, Suite 1120
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
arussell@shawkeller.com
dfry@shawkeller.com

John Schnurer
Kevin Patariu
Ryan Hawkins
Louise Lu
Vinay Sathe
PERKINS COIE LLP
11988 El Camino Real, Suite 350
San Diego, CA 92130
(858) 720-5700

Ryan McBrayer
Jonathan Putman
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
(206) 359-8000

Attorneys for Defendants
HTC Corp. and HTC America, Inc.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale
Karen L. Pascale (#2903)
Robert M. Vrana (# 5666)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
kpascale@ycst.com
rvrana@ycst.com

P. Andrew Blatt
WOOD HERRON & EVANS LLP
2700 Carew Tower
Cincinnati, OH 45202
(513) 241-2324
dblatt@whe-law.com

Attorneys for Defendant
Southern Telecom, Inc.

MORRIS, NICHOLS, ARCHT & TUNNELL LLP

/s/ Karen Jacobs
Karen Jacobs (#2881)
Mirco J. Haag (#6165)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
kjacobs@mnat.com
mhaag@mnat.com

Attorney for Defendants
Double Power Technology, Inc.,
Zowee Marketing Co., Ltd. and
Shenzen Zowee Technology Co., Ltd.

SHAW KELLER LLP

/s/ David M. Fry
John W. Shaw (# 3362)
Karen E. Keller (# 4489)
Andrew E. Russell (# 5382)
David M. Fry (#5486)
300 Delaware Avenue, Suite 1120
Wilmington, DE 19801
(302) 298-0700
jshaw@shawkeller.com
kkeller@shawkeller.com
arussell@shawkeller.com
dfry@shawkeller.com

Lucian C. Chen
Wing K. Chiu
LUCIAN C. CHEN, ESQ. PLLC
One Grand Central Place
40 East 42nd Street, Suite 4600
New York, NY 10165
(212) 710-3007

Attorneys for Defendant
Yifang USA, Inc. D/B/A E-Fun Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Rodger D. Smith II
Rodger D. Smith II (#3778)
Eleanor G. Tennyson (#5812)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
rsmith@mnat.com
etennyson@mnat.com

Michael J. Newton
Derek Neilson
Sang (Michael) Lee
ALSTON & BIRD LLP
2828 N. Harwood Street, Suite 1800
Dallas, TX 75201-2139

Patrick J. Flinn
ALSTON & BIRD LLP
1201 West Peachtree Street, Suite 4900
Atlanta, GA 30309-3424

Xavier M. Brandwajn
ALSTON & BIRD LLP
1950 University Avenue, 5th Floor
East palo Alto, CA 94303

Ross R. Barton
ALSTON & BIRD LLP
101 South Tyron Street, Suite 4000
Charlotte, NC 28280-4000
(704) 444-1000

Attorenys for Defendants
Acer, Inc. and Acer America Corporation

DATED: March 24, 2016

SO ORDERED this _____ day of _____, 2016.

_____
UNITED STATES DISTRICT JUDGE