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Attorneys for Defendant
NETFLIX, INC.

17 **IN THE UNITED STATES DISTRICT COURT**
18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 **OPENTV, INC., and NAGRA FRANCE SAS,**

21 **Plaintiffs,**

22 **v.**

23 **NETFLIX, INC.**

24 **Defendant.**

Case Nos.: 3:14-cv-01525-RS
3:14-cv-01723-RS

**SECOND STIPULATION AND
[PROPOSED] ORDER
RESCHEDULING CASE
MANAGEMENT CONFERENCE AND
HEARING ON NETFLIX'S MOTION
FOR SUMMARY JUDGMENT**

Judge: Honorable Richard Seeborg

1 Subject to the availability and approval of the Court, the parties hereby stipulate and respectfully
2 request that the October 9, 2014 Case Management Conference and Hearing on Defendant's Motion for
3 Summary Judgment (Dkt. No. 50) ("the Motion") be continued to Thursday, November 6, 2014, at 1:30
4 p.m.; the deadline to file an opposition to the Motion be extended to Thursday, October 16, 2014; and
5 the deadline to file a reply to the opposition to the Motion be extended to Thursday, October 23, 2014.
6 These dates have been modified once by stipulation and Court order. (Dkt. Nos. 51, 52.) The Court has
7 not yet entered a schedule setting any further deadlines for this case. The parties request this additional
8 time to continue settlement discussions between the parties' in-house counsel and business executives in
9 an attempt to resolve the parties' disputes without further litigation. The parties further agree to not
10 initiate any new litigation or other proceedings, anywhere worldwide, against the other party until
11 Thursday, November 6, 2014, to not serve any additional discovery requests until Thursday, November
12 6, 2014, and to extend the deadline to respond to previously served discovery requests to Thursday,
13 November 6, 2014. The parties therefore respectfully request an order pursuant to this stipulation.

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15 Dated: September 16, 2014

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17 KIRKLAND & ELLIS LLP

18 /s/ John R. Edwards

19 John R. Edwards (SBN 244310)

DURIE TANGRI LLP

20 /s/ Laura E. Miller

21 Laura E. Miller (SBN 271713)

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23 PURSUANT TO STIPULATION, IT IS SO ORDERED,

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25
26 Dated: 9/22/14

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RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE