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MOBILEIRON, INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

17 GOOD TECHNOLOGY CORPORATION and
GOOD TECHNOLOGY SOFTWARE, INC.,

18 Plaintiffs and Counter-Defendants,

19 v.

20 MOBILEIRON, INC.,

21 Defendant and Counter-Plaintiff.
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Case No. 5:12-cv-5826-PSG and
Case No. 5:15-cv-1694-PSG

**JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY
CASE NO. 5:12-CV-5826 AND
CASE NO. 5:15-CV-1694
FROM OCTOBER 19, 2015 UNTIL
DECEMBER 4, 2015**

1 Plaintiffs Good Technology Corporation and Good Technology Software, Inc.
 2 (collectively, “Good”) and Defendant MobileIron, Inc. (“MobileIron”) (collectively with Good,
 3 “the Parties”), by and through their respective counsel, hereby file this joint stipulation and
 4 respectfully request an Order staying Case No. 5:12-cv-05826 and Case No. 5:15-cv-01694 from
 5 October 19, 2015 until December 4, 2015, as follows:

6 **WHEREAS** the Parties are engaged in litigation before this Court in two separately
 7 pending actions: Case No. 5:12-cv-05826 (“the ’5826 action”) and Case No. 5:15-cv-01694 (“the
 8 ’1694 action”);

9 **WHEREAS** Good’s Motion for Judgement as a Matter of Law of No Invalidity of the
 10 219 Patent and Alternative Motion for a New Trial Thereon is currently pending in the ’5826
 11 action, with a hearing date of November 10, 2015 at 10 AM;¹

12 **WHEREAS** the following motions are currently pending in the ’1694 action:

- 13 • MobileIron’s Motion for Leave to Amend Invalidity Contentions, with a hearing
 14 date of November 3, 2015;²
- 15 • MobileIron’s Motion for Judgment on the Pleadings Under 35 U.S.C. § 101, with
 16 a hearing date of November 10, 2015 at 10 AM;³ and
- 17 • Good’s Motion to Strike MobileIron’s Infringement Contentions Under the
 18 Doctrine of Equivalents and Improper Election of Prior Art References, with a
 hearing date of November 3, 2015.⁴

19 **WHEREAS** significant case deadlines are approaching in the ’1694 action, including the
 20 deadline for the parties’ Joint Claim Construction and Prehearing Statement, and the deadline for
 21 the parties’ respective Opening Claim Construction Briefs, which will cause both parties to
 22 expend significant resources;⁵

23 **WHEREAS** the Parties continue their negotiations on a settlement agreement, and believe

24 ¹ ’5826 action, Dkt. Nos. 546, 547, 548, and 552.

25 ² ’1694 action, Dkt. Nos. 75 and 79 (as modified by Dkt. No. 78).

26 ³ ’1694 action, Dkt. No. 76 (as modified by Dkt. No. 78 and 9/29/15 Docket Entry Resetting
 27 Deadlines/Hearing).

⁴ ’1694 action, Dkt. No. 80 (as modified by Dkt. No. 82).

28 ⁵ ’1694 action, Dkt. No. 63 (as modified by Dkt. No. 78).

1 a stay of these matters would facilitate the parties' settlement negotiations;

2 **WHEREAS** the Parties, in an effort to promote efficiency and preserve judicial and party
3 resources, have reached an agreement to stay all pending deadlines from October 19, 2015 until
4 December 4, 2015, and vacate all hearings in the '5826 action and '1694 action before this Court;

5 **WHEREAS** the Parties further stipulate and agree that the stay requested herein is not
6 requested for purposes of delay and will not result in any prejudice to the Parties or to the Court;

7 **WHEREAS** the Parties agree to meet and confer following December 4, 2015 if
8 settlement is not reached, to determine a mutually agreeable briefing, hearing and case schedule.

9 **NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, IT IS**
10 **HEREBY STIPULATED** by and between the Parties that, subject to Court approval, the
11 currently scheduled hearings in the '5826 and '1694 actions on November 3 and November 10,
12 2015 be vacated; the '5826 and '1694 actions be stayed from October 19, 2015 until December 4,
13 2015; and the Parties will file a joint statement proposing a new schedule and hearing date within
14 seven (7) days of the stay lifting on December 4, 2015.

15 **IT IS SO STIPULATED.**
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2 Dated: October 19, 2015

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7 By: /s/ I. Neel Chatterjee
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8 Attorneys for Defendant
MOBILEIRON, INC.

9 Dated: October 19, 2015

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15 AND GOOD TECHNOLOGY SOFTWARE,
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17 Dated: October 19, 2015

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26 INC.

CERTIFICATION

I, Neel Chatterjee, am the ECF User whose identification and password are being used to file this Stipulation And Proposed Order To Stay Case Nos. 5:12-cv-05826 And 5:15-cv-01694. I attest, pursuant to General Order 45, that I have obtained concurrence in the filing of this document from the above signatories. Executed October 19, 2015 in Menlo Park, California.

/s/ I. Neel Chatterjee
I. NEEL CHATTERJEE

[PROPOSED] ORDER

The Court, having reviewed the Parties' stipulation, hereby orders as follows:

1. The hearing on Good's Motion for Judgment as a Matter of Law of No Invalidity of the 219 Patent, which is currently scheduled for November 10, 2015 in the case Good Technology Corp. v. MobileIron, Inc., Case No. CV-12-05826 (PSG), is hereby vacated;
2. The hearing on MobileIron's Motion for Judgment on the Pleadings Under 35 U.S.C. § 101, which is currently scheduled for November 10, 2015 in the case Good Technology Corp. v. MobileIron, Inc., Case No. CV-15-01694 (PSG), is hereby vacated;
3. The hearings on MobileIron's Motion for Leave to Amend Invalidity Contentions and Good's Motion to Strike MobileIron's Infringement Contentions Under the Doctrine of Equivalents and Improper Election of Prior Art References, which are currently scheduled for November 3, 2015 in the case Good Technology Corp. v. MobileIron, Inc., Case No. CV-12-01694 (PSG) are hereby vacated;
4. The case, Good Technology Corp. v. MobileIron, Inc., Case No. CV-12-01694 (PSG), is hereby stayed from October 19, 2015 until December 4, 2015;
5. The case, Good Technology Corp. v. MobileIron, Inc., Case No. CV-15-05826 (PSG), is hereby stayed from October 19, 2015 until December 4, 2015;
6. The Parties shall jointly file a Proposed Scheduling Order to reschedule the briefing on pending motions and other case deadlines in the case Good Technology Corp. v. MobileIron, Inc., Case No. CV-12-01694 (PSG) within seven (7) days of the stay being lifted.

1 7. The Parties shall jointly file a proposed new hearing date for Good's Motion for
2 Judgement as a Matter of Law and Alternative Motion for a New Trial in the case
3 Good Technology Corp. v. MobileIron, Inc., Case No. CV-12-05826 (PSG) within
4 seven (7) days of December 4, 2015.

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6 **IT IS SO ORDERED.**

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8 Dated: _____

HON. PAUL S. GREWAL
UNITED STATES MAGISTRATE JUDGE