

Adam R. Alper (CA Bar No. 196834)
 Bao Nguyen (CA Bar No. 198023)
 KIRKLAND & ELLS LLP
 555 California Street
 San Francisco, CA 94194
 Telephone: (415) 439-1400
 Facsimile: (415) 439-1500
 Email: adam.alper@kirkland.com

Gregory S. Arovas (pro hac vice)
 Todd M. Friedman (pro hac vice)
 Alex R. Henriques (pro hac vice)
 KIRKLAND & ELLIS LLP
 601 Lexington Avenue
 New York, NY 10022
 Telephone: (212) 446-4800
 Facsimile: (212) 446-4900
 Email: greg.arovas@kirkland.com
 Email: todd.friedman@kirkland.com
 Email: alex.henriques@kirkland.com

Nyika O. Strickland (pro hac vice)
 David Rokach (pro hac vice)
 KIRKLAND & ELLIS LLP
 300 N. LaSalle Street
 Chicago, IL 60654
 Telephone: (312) 862-2000
 Facsimile: (312) 862-2200
 Email: nyika.strickland@kirkland.com
 Email: david.rokach@kirkland.com

Attorneys for Plaintiff
 INTEL CORPORATION

Gregory S. Bishop (CA Bar No. 184680)
 PEPPER HAMILTON LLP
 333 Twin Dolphin Drive, Suite 400
 Redwood City, California 94065-1434
 Telephone: 650.802.3600
 Fax: 650.802.3650
 Email: bishopg@pepperlaw.com

William D. Belanger (Admitted *pro hac vice*)
 Alison L. McCarthy (Admitted *pro hac vice*)
 Anthony H. Cataldo (Admitted *pro hac vice*)
 Frank D. Liu (Admitted *pro hac vice*)
 Gwendolyn E. Tawresey (Admitted *pro hac vice*)
 Griffin N. Mesmer (Admitted *pro hac vice*)
 Ryan C. Deck (Admitted *pro hac vice*)
 PEPPER HAMILTON LLP
 125 High Street, 19th Floor,
 High Street Tower
 Boston, MA 02110
 Telephone: 617.204.5100
 Fax: 617.204.5150
 Email: belangerw@pepperlaw.com
 Email: mccarthy@pepperlaw.com
 Email: cataldoa@pepperlaw.com
 Email: liuf@pepperlaw.com
 Email: tawreseyg@pepperlaw.com
 Email: mesmerg@pepperlaw.com
 Email: deckr@pepperlaw.com

Attorneys for Defendant
 TELA INNOVATIONS, INC.

[Additional counsel listed on signature page]

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

INTEL CORPORATION,

Plaintiff,

v.

TELA INNOVATIONS, INC.,

Defendant.

CASE NO. 18-cv-02848-WHO

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND TIME FOR
 DEPOSITION PURSUANT TO DKT.
 NO. 199**

Judge: Hon. William H. Orrick

1 Under the Court's Order on Discovery Disputes (Dkt. No. 199), Intel must produce a witness
2 who can testify about Tela's Interrogatory No. 27 by March 18, 2020. Intel identified Mr. Keith Gray
3 on February 25, 2020 to testify pursuant to that Order and to provide testimony about certain additional
4 license agreements produced by Intel after the close of discovery as a compromise to a discovery
5 dispute. The deposition was scheduled to take place on March 18, 2020. Tela disagrees that Mr. Gray,
6 who has no first-hand knowledge of the topic, is sufficient to comply with the Court's Order. Intel's
7 position is that Mr. Gray is sufficiently knowledgeable about Interrogatory No. 27 and that its
8 production of Mr. Gray fully complies with the Court's Order. Tela will seek the Court's assistance
9 to order Intel to produce one or more witnesses with direct knowledge of the topic described in the
10 Court's Order on Discovery Disputes ("Other Depositions").

11 Due to the recent escalation of travel restrictions, social distancing and health concerns related
12 to COVID-19, the parties agree that some accommodations are warranted to the deadline for Intel to
13 comply with the Order on Discovery (Dkt. 199) and the deadlines for opening and rebuttal expert
14 reports (Dkt. 77). Thus, the parties stipulate to postpone the March 18, 2020 deadline for conducting
15 the deposition pursuant to the Court's Order on Discovery Disputes (Dkt. 199). The parties are
16 monitoring the situation relating to the outbreak of the disease, and will reschedule the deposition for
17 a future date.

18 The parties further stipulate that the deadline to provide opening expert reports will be
19 extended from March 25, 2020 to April 8, 2020, and rebuttal expert reports extended from April 24,
20 2020 to May 8, 2020. The parties further stipulate that a limited supplementation of opening expert
21 reports by Tela will be allowed, limited to information addressed in Mr. Gray's deposition and limited
22 to information about the additional license agreements for which Mr. Gray will provide testimony that
23 is not evident from the face of those agreements, and will be due 7 days after Mr. Gray's deposition.
24 Limited supplemental rebuttal expert reports, limited to the issues raised in the supplemental opening
25 expert reports, will be due 7 days after service of the supplemental opening expert reports, or the
26 deadline for rebuttal expert reports, whichever is later. The parties have not reached agreement on a
27 procedure to provide further limited supplementation if the Court orders Other Depositions. The
28 parties will address that issue in their joint discovery letter.

The parties have not previously sought extensions of any of the above deadlines and no other dates in the calendar are affected by this requested change.

IT IS SO STIPULATED, through Counsel of Record.

DATED: March 16, 2020

Respectfully submitted,

By: /s/ Todd M. Friedman

By: /s/ Gregory S. Bishop

Adam R. Alper (CA Bar No. 196834)
KIRKLAND & ELLIS LLP
555 California Street
San Francisco, CA 94194
Telephone: (415) 439-1400
Facsimile: (415) 439-1500
Email: adam.alper@kirkland.com

Gregory S. Bishop (CA Bar No. 184680)
PEPPER HAMILTON LLP
333 Twin Dolphin Drive, Suite 400
Redwood City, California 94065-1434
Telephone: 650.802.3600
Fax: 650.802.3650
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Ryan C. Deck (Admitted *pro hac vice*)
PEPPER HAMILTON LLP
125 High Street, 19th Floor,
High Street Tower
Boston, MA 02110
Telephone: 617.204.5100
Fax: 617.204.5150
Email: belangerw@pepperlaw.com
Email: mccarthya@pepperlaw.com
Email: cataldoa@pepperlaw.com
Email: liuf@pepperlaw.com
Email: tawreseyg@pepperlaw.com
Email: mesmerg@pepperlaw.com
Email: deckr@pepperlaw.com
Tuhin Ganguly (CA Bar No. 261484)
PEPPER HAMILTON LLP
2000 K Street, N.W., Suite 600
Washington, D.C. 20006-1865
Telephone: 202.220.1200
Fax: 202.220.1465
Email: gangulyt@pepperlaw.com
Attorneys for Defendant and Counterclaimant,
TELA INNOVATIONS, INC.

Nyika O. Strickland (pro hac vice)
David Rokach (pro hac vice)
KIRKLAND & ELLIS LLP
300 N. LaSalle Street
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: nyika.strickland@kirkland.com
Email: david.rokach@kirkland.com

Attorneys for Plaintiff and Counterdefendant,
INTEL CORPORATION

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2 **IT IS ORDERED** that the forgoing Agreement is approved.

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4 Dated: March 18, 2020

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6 Honorable William H. Orrick

7 UNITED STATES DISTRICT JUDGE
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1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

2 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
3 document has been obtained from the other signatories.

4
5 Respectfully submitted,

6 By: /s/ Todd M. Friedman

7 Todd M. Friedman (pro hac vice)

8 KIRKLAND & ELLIS LLP

9 601 Lexington Avenue

10 New York, NY 10022

11 Telephone: (212) 446-4800

12 Facsimile: (212) 446-4900

13 Email: todd.friedman@kirkland.com
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19
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