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Plaintiff
JENAM TECH,
LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JENAM TECH, LLC,
Plaintiff,

v.

GOOGLE LLC,
Defendant.

Case No. 4:22-cv-02836-JST

**STIPULATION AND [PROPOSED]
ORDER RE: CLAIM NARROWING AND
STAY**

Dept.: Courtroom 6 – 2nd Floor
Judge: Honorable Jon S. Tigar

Date Filed: October 5, 2022
Trial Date: None Set

[Caption Continued On Next Page]

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JENAM TECH, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 4:22-cv-02837-JST

Dept.: Courtroom 6 – 2nd Floor
Judge: Honorable Jon S. Tigar

Date Filed: May 13, 2022
Trial Date: None Set

JENAM TECH, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 4:22-cv-02838-JST

Dept.: Courtroom 6 – 2nd Floor
Judge: Honorable Jon S. Tigar

Date Filed: May 13, 2022
Trial Date: None Set

JENAM TECH, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 4:22-cv-02839-JST

Dept.: Courtroom 6 – 2nd Floor
Judge: Honorable Jon S. Tigar

Date Filed: May 13, 2022
Trial Date: None Set

1 **STIPULATION**

2 Pursuant to the Court's October 3, 2022 Order Re: Case Management Statement
3 ("October 3 Order")¹, Plaintiff Jenam Tech, LLC ("Jenam") and Defendant Google LLC
4 ("Google") (together, "the Parties"), by and through their respective undersigned counsel, hereby
5 stipulate as follows:

6 WHEREAS, on May 13, 2022, Jenam filed the above-captioned actions ("May 2022
7 Cases") against Google;

8 WHEREAS, on July 11, 2022, Jenam filed motions to stay the May 2022 Cases;

9 WHEREAS, on September 26, 2022, the Court denied Jenam's motions to stay without
10 prejudice ("September 26 Order")²;

11 WHEREAS, on September 27, 2022, the Parties filed Joint Case Management Statements³
12 explaining that the Parties met and conferred and agreed that by October 18, 2022, Jenam will
13 narrow the claims in the May 2022 Cases by selecting a maximum of 20 claims to assert in the
14 May 2022 Cases;

15 WHEREAS, this stipulation between the Parties memorializes that agreement, as directed
16 by the Court's October 3 Order;

17 WHEREAS, the Parties agree that once Jenam narrows the claims in the May 2022 Cases,
18 the May 2022 Cases should be stayed pending the resolution of *inter partes* review proceedings
19 for reasons similar to the Court's rationale in staying related Case No. 21-cv-07994-JST (Lead);

20 WHEREAS, the Court ordered Jenam to narrow the claims in the May 2022 Cases by
21 selecting a maximum of 20 claims to assert in the May 2022 Cases;

22 WHEREAS, the Court ordered Jenam's election of 20 claims be made by October 18,
23 2022;

24
25 ¹ ECF No. 43 in Case No. 4:22-cv-2836, ECF No. 40 in Case No. 4:22-cv-2837 and Case No.
26 4:22-cv-2838, and ECF No. 41 in Case No. 4:22-cv-2839.

27 ² ECF No. 41 in Case No. 4:22-cv-2836, ECF No. 38 in Case No. 4:22-cv-2837 and Case No.
28 4:22-cv-2838, and ECF No. 39 in Case No. 4:22-cv-2839.

³ ECF No. 42 in Case No. 4:22-cv-2836, ECF No. 39 in Case No. 4:2-cv-2837 and Case No.
4:22-cv-2838, and ECF No. 40 in Case No. 4:22-cv-2839.

1 WHEREAS, the Court ordered the May 2022 Cases to be stayed following this election of
2 claims.

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

4 Jenam will narrow the claims in the May 2022 Cases by selecting a maximum of 20
5 claims to assert in the May 2022 Cases; Jenam's election of 20 claims will be made by October
6 18, 2022; and the May 2022 Cases will be stayed following this election of claims.

7
8 SO STIPULATED.

9 Dated: October 11, 2022

KEKER, VAN NEST & PETERS LLP

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11 By: /s/ RYLEE KERCHER OLM

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1 Dated: October 11, 2022

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[PROPOSED] ORDER

The Parties have jointly requested to stay the above captioned cases following Jenam's narrowing of the total claims in the above-captioned cases to a maximum of 20 asserted claims by October 18, 2022. Having considered the Parties' request, and good cause appearing, the Court orders as follows: The Parties' stipulated request is GRANTED. Accordingly, on October 19, 2022, subsequent to Jenam's narrowing to 20 asserted claims, the following cases are stayed: Case Nos. 4:22-cv-02836-JST; 4:22-cv-02837-JST; 4:22-cv-02838-JST; and 4:22-cv-02839-JST. All pending deadlines will also thereby be stayed.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: October 12, 2022



THE HONORABLE JON S. TIGAR
United States District Court Judge