

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF DELAWARE**

	)	
IMMERVISION, INC.	)	
	)	
<i>Plaintiff,</i>	)	Civil Action No. 18-cv-01630-MN-CJB
v.	)	JURY TRIAL DEMANDED
LG ELECTRONICS U.S.A., INC. and LG ELECTRONICS INC.,	)	
	)	
<i>Defendant.</i>	)	

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	)	
IMMERVISION, INC.	)	
	)	
<i>Plaintiff,</i>	)	Civil Action No. 18-cv-01631-MN-CJB
v.	)	JURY TRIAL DEMANDED
LG ELECTRONICS U.S.A., INC. and LG ELECTRONICS INC.,	)	
	)	
<i>Defendant.</i>	)	

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**STIPULATION AND [PROPOSED] ORDER TO VACATE DEADLINES**

**WHEREAS** Plaintiff Immervision, Inc. alleges in these consolidated actions that Defendants LG Electronics U.S.A., Inc. and LG Electronics Inc. infringe one patent: U.S. Patent No. 6,844,990 (“the ‘990 patent”);

**WHEREAS** on December 14, 2021, Magistrate Judge Burke issued a Report and Recommendation regarding claim construction for two disputed terms of the ‘990 patent;

**WHEREAS** Plaintiff acknowledges that Defendants do not infringe the patent-in-suit based on the claim construction recommendation on the claim term “panoramic objective lens” in the Report and Recommendation;

**WHEREAS** Plaintiff filed objections to one claim term (namely, “panoramic objective lens”) in Magistrate Judge Burke’s Report and Recommendation on December 23, 2021;

**WHEREAS** the parties agree that, if the District Court adopts the claim construction recommendation on the claim term “panoramic objective lens” in the Report and Recommendation, they will stipulate to a judgment of non-infringement based on such construction so that Plaintiff can appeal to the U.S. Court of Appeals for the Federal Circuit;

**WHEREAS** good cause exists for the Court to vacate the current deadlines in the case because doing so will promote efficiency and avoid waste of resources by obviating the need for the parties to exchange, at least, final contentions and expert reports based on claim constructions that Magistrate Burke has rejected, which would be unnecessary and moot should the District Court adopt the Report and Recommendation;

**IT IS HEREBY STIPULATED AND AGREED** by the Parties, through their undersigned counsel, subject to the approval of the Court, that:

1. all current deadlines in the above-captioned consolidated cases as set forth in the June 8, 2021 Amended Scheduling Order are vacated;
2. within fourteen (14) days of the Court’s ruling on Plaintiff’s objections to the Report and Recommendation, the parties will file either a stipulation for entry of judgment, or a proposed scheduling order.

**SO STIPULATED:**

MORGAN, LEWIS & BOCKIUS LLP

PANITCH SCHWARZE BELISARIO &  
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/s/ John V. Gorman

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*Counsel for Defendants LGElectronics  
U.S.A., Inc. and LG Electronics Inc.*

*Counsel for Plaintiff ImmerVision, Inc.*

**SO ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2021.

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