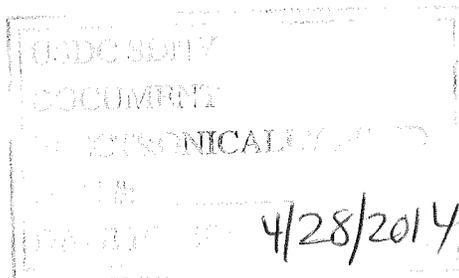


April 25, 2014

MEMO ENDORSED

VIA ECF

The Honorable Denise L. Cote
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312



RE: In Re Canon Patent Litigation
 14 Civ. 537 (DLC)

Your Honor:

This office represents defendant Wazana Brothers International, Inc. in the above-referenced actions. We write on behalf of all defendants who have been served in these consolidated actions to request an extension of defendants' time to respond to Canon Inc.'s complaints from May 16, 2014 to June 23, 2014. Canon has consented to the requested extension. Because the parties' agreement would extend the current deadline set by the Court's April 3, 2014 Order (D.E. 16) for all defendants to respond to Canon's complaints, the parties seek the Court's approval for the extension. Prior to the Court's April 3, 2014 Order, several defendants had obtained extensions of time to respond to Canon's complaint, but the April 3, 2014 Order, entered after Canon filed its Amended Complaints, reset all defendants' response dates to May 16, 2014.

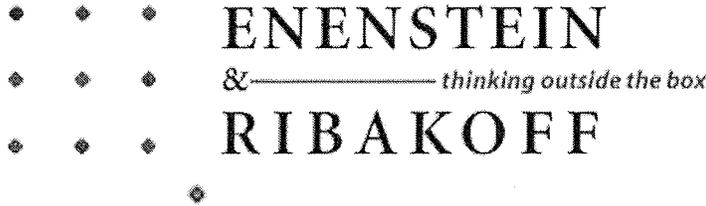
As plead, the operative complaints against all defendants in these consolidated actions allege violations of twelve patents that collectively contain 1,042 claims. Pursuant to Local Rule 7.1(d), Case Management Techniques for Complex Civil Cases, and the Court's Individual Practices, and further to the Court's April 3, 2014 Order, counsel for defendants conferred with counsel for Canon and reached an agreement to avoid motions by defendants to dismiss and/or for a more definite statement to address the large number of claims in the 12 patents asserted by Canon. As a consequence of the conference among counsel, Canon has agreed that it will identify and limit the number of claims it intends to pursue against each defendant to 50 or fewer claims by no later than May 23, 2014, the date currently scheduled for the initial pretrial conference. Accordingly, extending defendants' time to respond to Canon's complaints from May 16, 2014, to June 23, 2014, will allow the defendants adequate

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time to investigate and respond based on a much more manageable universe of 50 claims or less, rather than all 1,042 claims in the 12 patents Canon has asserted. The parties recognize that the Court's Order of April 3, 2014 states that the Court set the May 16th response deadline so that motions to dismiss could be addressed at the May 23rd conference. However, because defendants' contemplated motions to dismiss and/or for a more definite statement will be avoided by the parties' agreement, the parties believe that the requested extension will facilitate and expedite these consolidated actions.

The parties therefore respectfully request that the Court extend the deadline for defendants to respond to the operative complaints from May 16, 2014, to June 23, 2014 (30 days after the deadline for Canon's provision of its lists of asserted claims). The parties have agreed that if any party intends to bring a motion to dismiss, other than a motion to dismiss regarding the number of asserted claims, the Court's May 16, 2014 deadline for doing so still applies.

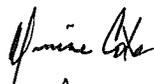
Respectfully submitted,

ENENSTEIN & RIBAKOFF, APC

By: 
 Teri T. Pham (CA Bar No. 193383)
Pro Hac Vice Application Pending

cc: All Counsel of Record

TTP/ffy

Granted.

 April 28, 2014