

1 Kalpana Srinivasan, Bar No. 237460
ksrinivasan@susmangodfrey.com
2 Michael Gervais, Bar No. 330731
mgervais@susmangodfrey.com
3 **SUSMAN GODFREY L.L.P.**
1900 Avenue of the Stars, Suite 1400
4 Los Angeles, California 90067-6029
Telephone: (310) 789-3100
5 Facsimile: (310) 789-3150

Theresa C. Becerra, Bar No. 205338
tbecerra@spencerfane.com
SPENCER FANE LLP
201 Santa Monica Blvd., Suite 550
Santa Monica, CA 90401
Telephone: (424) 217-1830
Facsimile: (424) 217-1854

6 *(See additional counsel on signature*
7 *page)*
8 *Attorneys for Defendant*
9 *Huawei Technologies Co., Ltd.*

(See additional counsel on signature
10 *page)*
11 *Attorneys for Plaintiff*
12 *NETGEAR, INC.*

13 **IN THE UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION – LOS ANGELES**

16 NETGEAR, INC.,

17 Plaintiff,

18 vs.

19 HUAWEI TECHNOLOGIES CO.,
20 LTD.,

21 Defendant.

Case No. 2:24-cv-824 AB (AJRx)

**NOTICE OF MOTION TO STAY
PROCEEDINGS PENDING
FINAL SETTLEMENT**

ORAL ARGUMENT WAIVED
PURSUANT TO L.R. 7-15

NOTICE OF MOTION AND MOTION; RELIEF REQUESTED

PLEASE TAKE NOTICE that as reflected in this Joint Motion to Stay Proceedings Pending Final Settlement (“Motion”), Plaintiff Netgear, Inc. and Defendant Huawei Technologies, Co., Ltd. (collectively, “Parties”) hereby move to stay proceedings and suspend all deadlines for thirty (30) days pending the final settlement between the Parties and the filing of a stipulation of a dismissal with prejudice to avoid unnecessary expenditure of judicial and party resources. The Parties’ Motion is based on this Notice; the accompanying Motion; the Proposed Order; and any argument of counsel. The Parties waive oral argument pursuant to Local Rule 7-15 of this Court.

L.R. 7-3 CERTIFICATION

This Motion is made jointly following the conference of counsel pursuant to L.R. 7-3 which took place on January 1-2, 2025.

Dated: January 3, 2025

Respectfully submitted,

By: */s/ Kalpana Srinivasan*

Kalpana Srinivasan, Bar No. 237460
ksrinivasan@susmangodfrey.com
Michael Gervais, Bar No. 330731
mgervais@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

J. Hoke Peacock, III, *pro hac vice*
tpeacock@susmangodfrey.com
Shawn L. Raymond, *pro hac vice*
sraymond@susmangodfrey.com
Hunter Vance, *pro hac vice*
hvance@susmangodfrey.com
Larry Liu, *pro hac vice*

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liu@susmangodfrey.com
Julia Risley, *pro hac vice*
jrisley@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1000 Louisiana, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Katherine Peaslee, Bar No. 310298
kpeaslee@susmangodfrey.com
Steve Seigel, *pro hac vice*
sseigel@susmangodfrey.com
SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, Washington 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883

*Attorneys for Defendant
Huawei Technologies Co., Ltd.*

By: /s/ Blair M. Jacobs
Blair M. Jacobs (*Pro Hac Vice*)
bjacobs@spencerfane.com
Christina A. Ondrick (*Pro Hac Vice*)
condrick@spencerfane.com
John S. Holley (*Pro Hac Vice*)
jholley@spencerfane.com
SPENCER FANE LLP
900 16TH ST. N.W., Suite 400
Washington, D.C. 20006
Telephone: 816.474.8100
Facsimile: 816.474.3216

Theresa C. Becerra
(State Bar No. 205338)
tbecerra@spencerfane.com
SPENCER FANE LLP
201 Santa Monica Blvd., Suite 550
Santa Monica, CA 90401
Telephone: 424.217.1830
Facsimile: 424.217.1854
*Attorneys for Plaintiff
NETGEAR, INC.*

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FILER’S ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2), the filer hereby attests that all other signatories to this document concur in the content of, and have authorized, this filing.

Dated: January 3, 2025

By: */s/ Steven M. Seigel*

Steven M. Seigel
SUSMAN GODFREY L.L.P.

*Attorney for Defendant
Huawei Technologies Co., Ltd.*

1 Kalpana Srinivasan, Bar No. 237460
ksrinivasan@susmangodfrey.com
2 Michael Gervais, Bar No. 330731
mgervais@susmangodfrey.com
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Telephone: (310) 789-3100
5 Facsimile: (310) 789-3150

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tbecerra@spencerfane.com
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201 Santa Monica Blvd., Suite 550
Santa Monica, CA 90401
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13 **IN THE UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION – LOS ANGELES**

16 NETGEAR, INC.,

17 Plaintiff,

18 vs.

19 HUAWEI TECHNOLOGIES CO.,
20 LTD.,

21 Defendant.

Case No. 2:24-cv-824 AB (AJRx)

**JOINT MOTION TO STAY
PROCEEDINGS PENDING
FINAL SETTLEMENT**

1 Plaintiff Netgear, Inc. (“Netgear”) and Defendant Huawei Technologies Co.,
2 Ltd. (“Huawei”) (collectively, the “Parties”) file this Joint Motion to Stay
3 Proceedings Pending Final Settlement. The Parties have settled in principle the
4 matters in controversy in this action. The Parties jointly request that the Court stay
5 proceedings and suspend all deadlines for thirty (30) days pending the final
6 settlement and the filing of a stipulation of a dismissal with prejudice to avoid
7 unnecessary expenditure of judicial and party resources.

8 For avoidance of doubt, the Parties jointly request that the Court stay and/or
9 suspend all pending deadlines and proceedings associated with the following:

- 10 • Huawei’s Motion to Strike Portions of Complaint (ECF Nos. 76-
11 77);
- 12 • Huawei’s Motion to Dismiss (ECF Nos. 80, 84);
- 13 • Netgear’s Motion to Bifurcate and Request for RAND
14 Determination (ECF Nos. 113-115);
- 15 • Netgear’s Motion for Anti-Enforcement Injunction or,
16 Alternatively, Entry of Interim License (ECF Nos. 126-128);
- 17 • The hearing scheduled for January 24, 2025 (ECF No. 137); and
- 18 • The Parties’ Joint Stipulation to Continue the January 24, 2025
19 Hearing and Extend Briefing Schedule (ECF No. 142).

20 The Parties will promptly file a stipulation of joint dismissal with prejudice of
21 the claims in this action upon Netgear’s completion of terms required under a license
22 agreement under which Netgear took a license to certain Huawei patents.

23 Dated: January 3, 2025

Respectfully submitted,

24
25 By: */s/ Kalpana Srinivasan*

26 Kalpana Srinivasan, Bar No. 237460
27 ksrinivasan@susmangodfrey.com
28 Michael Gervais, Bar No. 330731
mgervais@susmangodfrey.com

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1900 Avenue of the Stars, Suite 1400
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Facsimile: (310) 789-3150

J. Hoke Peacock, III, *pro hac vice*
tpeacock@susmangodfrey.com
Shawn L. Raymond, *pro hac vice*
sraymond@susmangodfrey.com
Hunter Vance, *pro hac vice*
hvance@susmangodfrey.com
Larry Liu, *pro hac vice*
lliu@susmangodfrey.com
Julia Risley, *pro hac vice*
jrisley@susmangodfrey.com

SUSMAN GODFREY L.L.P.
1000 Louisiana, Suite 5100
Houston, TX 77002-5096
Telephone: (713) 651-9366
Facsimile: (713) 654-6666

Katherine Peaslee, Bar No. 310298
kpeaslee@susmangodfrey.com
Steve Seigel, *pro hac vice*
sseigel@susmangodfrey.com

SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, Washington 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883

Attorneys for Defendant
Huawei Technologies Co., Ltd.

By: /s/ Blair M. Jacobs
Blair M. Jacobs (*Pro Hac Vice*)
bjacobs@spencerfane.com
Christina A. Ondrick (*Pro Hac Vice*)
condrick@spencerfane.com
John S. Holley (*Pro Hac Vice*)
jholley@spencerfane.com

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900 16TH ST. N.W., Suite 400
Washington, D.C. 20006
Telephone: 816.474.8100
Facsimile: 816.474.3216

Theresa C. Becerra
(State Bar No. 205338)
tbecerra@spencerfane.com

SPENCER FANE LLP
201 Santa Monica Blvd., Suite 550
Santa Monica, CA 90401
Telephone: 424.217.1830
Facsimile: 424.217.1854

Attorneys for Plaintiff
NETGEAR, INC.

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Dated: January 3, 2025

By: */s/ Steven M. Seigel*

Steven M. Seigel
SUSMAN GODFREY L.L.P.

Attorney for Defendant
Huawei Technologies Co., Ltd.

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**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES**

NETGEAR, INC.,

Plaintiff,

vs.

HUAWEI TECHNOLOGIES CO.,
LTD.,

Defendant.

Case No. 2:24-cv-824 AB (AJRx)

**[PROPOSED] ORDER
GRANTING JOINT MOTION TO
STAY PROCEEDINGS PENDING
FINAL SETTLEMENT**

ORAL ARGUMENT WAIVED
PURSUANT TO L.R. 7-15

Jud. Officer: Hon André Birotte Jr.

1 Before the Court is the Joint Motion to Stay Proceedings Pending Final
2 Settlement (“Motion”) filed by Plaintiff Netgear, Inc. (“Netgear”) and Defendant
3 Huawei Technologies Co., Ltd. (“Huawei”). Having considered the papers submitted
4 by the parties, the Court hereby GRANTS the Motion and orders that all proceedings
5 and deadlines in this matter are STAYED for thirty (30) days, including the
6 proceedings and deadlines associated with:

- 7 • Huawei’s Motion to Strike Portions of Complaint (ECF Nos. 76-
8 77);
- 9 • Huawei’s Motion to Dismiss (ECF Nos. 80, 84);
- 10 • Netgear’s Motion to Bifurcate and Request for RAND
11 Determination (ECF Nos. 113-115);
- 12 • Netgear’s Motion for Anti-Enforcement Injunction or,
13 Alternatively, Entry of Interim License (ECF Nos. 126-128);
- 14 • The hearing scheduled for January 24, 2025 (ECF No. 137); and
- 15 • The Parties’ Joint Stipulation to Continue the January 24, 2025
16 Hearing and Extend Briefing Schedule (ECF No. 142).

17
18 **IT IS SO ORDERED.**

19
20
21 DATED:

By: _____
HON. ANDRE BIROTTE JR
UNITED STATES DISTRICT JUDGE