

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KONINKLIJKE PHILIPS N.V.  
and PHILIPS NORTH AMERICA LLC,

Plaintiffs/Counterclaim-Defendants,

v.

ZOLL MEDICAL CORPORATION,

Defendant/Counterclaim-Plaintiff.

C.A. No. 1:10-cv-11041-NMG

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**JOINT REQUEST FOR TEMPORARY STAY OF ALL DEADLINES AND RULINGS**

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Plaintiffs Koninklijke Philips N.V. and Philips North America LLC (“Phillips”) and Defendant ZOLL Medical Corporation (“ZOLL”), hereby jointly move for an Order temporarily staying all case deadlines and rulings from the Court.

On October 27, 2017, the parties participated in a day of settlement discussions in New York City, and the parties have continued to actively discuss settlement since then. The parties have now reached substantial agreement on aspects of a settlement structure and desire further time to negotiate and finalize an agreement that will resolve this matter. Accordingly, the parties jointly request the following:

- The parties shall either file a stipulated dismissal or a joint status report by **November 28, 2017**.
- The parties will file any motions for leave to file reply briefs on the pending post-trial motions no later than **December 4, 2017**.

- The Court will hold any rulings on pending motions or other matters through

**December 4, 2017.**

Respectfully submitted,

Dated: November 3, 2017

Dated: November 3, 2017

/s/ J. Michael Jakes

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**Certificate Pursuant to Local Rule 7.1(a)(2)**

I, Rebecca Lyn Carson, hereby certify that counsel conferred and attempted in good faith to resolve or narrow the issues raised herein. As indicated above, the parties are jointly filing this motion.

/s/ Rebecca Lyn Carson  
Rebecca Lyn Carson

**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 3rd day of November, 2017.

*/s/ Rebecca L. Carson*

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Rebecca L. Carson