

EXHIBIT A

Plaintiff's Proposed Schedule of Pretrial and Trial Dates for the Signal Actions

Case No.	2:14-cv-03113-JAK-JEM			
Case Name:	Signal IP, Inc. v. Volkswagen Group of America, Inc., et al.			
		Plaintiff's Request	Defendant's Request	Court Order
[X] Jury Trial [] Court Trial: (Tuesday at 9:00 a.m.)		Beginning 06/27/17, 5 day trials, separated by 8 weeks.	3/1/16	
Time Estimate: <u>5-10</u> Days / <u> </u> Weeks				
Final Pretrial Conference and Status Conference re Exhibits: (Monday at 3:00 p.m.) <i>2 weeks before the trial date</i>		06/12/17	2/22/16	
Post Mediation Status Conference: (Monday at 1:30 p.m.) <i>30 days before the cut-off date</i>		11/3/14	36 weeks after Markman decision	
Last day to conduct a settlement conference/mediation Selection of Settlement Procedure: 1. Magistrate Judge 2. Attorney Settlement Officer Panel 3. Outside ADR/Non-Judicial/Private Neutral		10/20/14	34 weeks after Markman decision	
Selection: Magistrate Judge _____				
Deadlines:	Weeks After Listed Event	Plaintiff(s) Request	Defendant(s) Request	Court Order
Infringement Contentions (S.P.R. 2.1, 2.2)	2 (After Order Setting Scheduling Conference)	Completed: 7/7/14		
Early Meeting of the parties, Initial Disclosures	3 (After Order Setting Scheduling Conference)	Completed: Early Meeting: 8/25/14 Initial Disclosures: 8/4/14		
Joint Rule 26(f) Report (S.P.R. 2.3)	6 (After Order Setting Scheduling Conference)	9/5/14	9/5/14	
Scheduling Conference (S.P.R. 2.4)	[Set by Court]	9/15/14	9/15/14	
Invalidity Contentions (S.P.R. 2.5, 2.6)	2 (After Scheduling Conference)	9/29/14	9/29/14	
Exchange of Claim Terms (S.P.R. 3.1)	4 (After Scheduling Conference)	10/13/14	10/13/14	

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1	Exchange Proposed Constructions and Evidence (S.P.R. 3.2)	6 (After Scheduling Conference)	10/27/14	10/27/14	
2					
3	Complete Claim Construction	10 (After Scheduling Conference)	11/24/14	11/24/14	
4	Discovery (S.P.R. 3.3)				
5	Joint Markman Prehearing Statement (S.P.R. 3.4)	11 (After Scheduling Conference)	12/1/14	12/1/14	
6					
7	Simultaneous Opening Markman Briefs (S.P.R. 3.5)	12 (After Scheduling Conference)	12/8/14	12/8/14	
8					
9	Simultaneous Responding Markman Briefs, Tutorials, and Presentation Materials (S.P.R. 3.5)	14 (After Scheduling Conference)	12/22/14	12/22/14	
10					
11					
12	Markman Hearing (S.P.R. 3.6) (must be Monday)	17 (After Scheduling Conference)	1/12/15	1/12/15	
13					
14	Markman Decision	[set by Court]	estimated 2/12/15	[set by Court]	
15	Patentee Files Final Infringement Contentions and Expert Reports on Infringement, All Parties File Advice of Counsel (S.P.R. 4.1, 4.4)	4 (After Markman Decision)	Weeks after Markman Decision, phased by five patent groups:	8 weeks after Markman decision	
16			10 weeks (Group 1 – '601 Patent)		
17			20 weeks (Group 2 – '486 Patent)		
18			30 weeks (Group 3 – '927 Patent)		
19			40 weeks (Group 4 – '775 / '374 Patents)		
20			50 weeks (Group 5 – '375/007 Patents)		
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28	Accused Infringer Files Final	8 (After Markman Decision)	Weeks after Markman	16 weeks after	

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1	Invalidity Contentions, Rebuttal Non-Infringement Expert Reports, and Other Expert Reports Where Accused Infringer has Burden of Proof (S.P.R. 4.2)		Decision, phased by patent groups:	Markman decision	
2					
3			20 weeks (Group 1)		
4			30 weeks (Group 2)		
5			40 weeks (Group 3)		
6			50 weeks (Group 4)		
7			60 weeks (Group 5)		
8					
9	Patentee's Rebuttal Expert Reports on Issues Where Accused Infringer has Burden of Proof (S.P.R. 4.3)	12 (After Markman Decision)	Weeks after Markman Decision, phased by patent groups:	24 weeks after Markman decision	
10					
11			30 weeks (Group 1)		
12			40 weeks (Group 2)		
13			50 weeks (Group 3)		
14			60 weeks (Group 4)		
15			70 weeks (Group 5)		
16					
17	Patentee Files Other Expert Reports on Issues Where Patentee has Burden of Proof (e.g. Damages)		Weeks After Markman Decision, Phased in Three Defendant Groups: Kia, BMW, Nissan and Subaru (Defendant Group 1); Honda, Chrysler, Mazda, Volvo and Mitsubishi (Defendant Group 2); and VWGoA, Ford, Mercedes, Porsche, and Jaguar (Defendant Group 3):	30 weeks after Markman decision	
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28	20 weeks (Defendant				

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		Group 1) 40 weeks (Defendant Group 2) 60 weeks (Defendant Group 3)		
Accused Infringer Files Rebuttal Expert Reports on Other Issues Where Patentee has Burden of Proof (e.g. Damages)		Weeks After Markman Decision, Phased in Three Defendant Groups: 30 weeks (Defendant Group 1) 50 weeks (Defendant Group 2) 70 weeks (Defendant Group 3)	36 weeks after Markman decision	
Discovery Cut-Off (S.P.R. 4.3)	32 (After Markman Decision)	80 Weeks (After Markman Decision)	40 weeks after Markman decision	

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1	Last Date to File Dispositive Motions (S.P.R. 4.5)	36 (After Markman Decision)	Weeks After Markman Decision, Phased by Patent Groups:	44 weeks after Markman decision	
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18	Last Date to Hear Motions (not file)	43 (After Markman Decision)	Weeks After Markman Decision:	47 weeks after Markman decision	
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20					
21	Last Date to Add Parties/Amend Pleadings		9/29/14	1/31/15	
22					
23	Settlement Procedure Selection: <i>(ADR-12 Form will be completed by Court after scheduling conference)</i>		Plaintiff(s) Request	Defendant(s) Request	Court Order
24	Last day to conduct settlement conference/mediation		1. Magistrate Judge	3 - 3. Outside ADR/Non-Judicial (Private), or Magistrate Judge	1. Magistrate Judge
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27	10/20/14	34 weeks after Markman decision			
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