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16 *Philips North America LLC*

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**
19 **WESTERN DIVISION**

20 Philips North America LLC,

21 *Plaintiff,*

22 vs.

23
24 Garmin International, Inc. and
Garmin Ltd.,

25 *Defendants.*
26

Case No. 2:19-cv-06301-AB-KS

**JOINT STIPULATION TO MODIFY
THE SCHEDULING ORDER**

Hon. André Birotte Jr.

1 Plaintiff Philips North America LLC (“Philips”) and Defendants Garmin International,
 2 Inc. and Garmin Ltd. (collectively “Garmin”) hereby jointly stipulate and respectfully request
 3 that the Court extend some of the deadlines previously included in the Court’s Original
 4 Scheduling Order as set forth in the table below. While the parties have been working to
 5 complete fact discovery, the realities of client and attorney schedules in a work-from home
 6 situation, and the need to schedule remote depositions across multiple time zones, have
 7 complicated those efforts. Even so, the parties are proposing a limited extension of time that
 8 would only affect the deadlines for the close of fact discovery, expert reports, expert discovery,
 9 and the filing of dispositive motions.

10 All other deadlines in the Court’s original Scheduling Order of January 8, 2020 (Dkt. 51)
 11 would remain in place.

12 Additionally, and in the interests of streamlining and simplifying the case, the parties
 13 have also agreed to deadlines to narrow the dispute by limiting their infringement and invalidity
 14 contentions to a certain number of asserted claim and prior art references. Those deadlines have
 15 been included in the table below.

16 Accordingly, and for good cause shown, the parties respectfully request that the Court
 17 enter an amended scheduling order consistent with the below. A Proposed Order has been filed
 18 herewith.

EVENT	OLD DATE	NEW PROPOSED DATE
Plaintiff to limit asserted patent claims to no more than 7 per patent and 20 total.	n/a	August 24, 2020
Fact Discovery Cut-off	September 4, 2020	September 18, 2020
Defendants to limit asserted pieces of prior art (with any combination constituting one piece of prior art) to no more than 7 per patent and 30 total.	n/a	September 25, 2020

1	Rebuttal Expert Reports	October 16, 2020	October 30, 2020
2	Expert Discovery Cut-off	November 6, 2020	November 13, 2020
3	Dispositive Motion Filing	November 24, 2020	December 4, 2020
4	Deadline		

6 Dated: August 7, 2020

Respectfully submitted,

7 **LAMKIN IP DEFENSE**

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9 /s/ Rachael D. Lamkin

/s/ Jean-Paul Ciardullo

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25 I certify that Rachael D. Lamkin authorized the electronic filing of this document.