

**EXHIBIT B**  
**PROPOSED SCHEDULE OF PRETRIAL AND TRIAL DATES IN UTILITY PATENT**  
**CASES ASSIGNED TO THE HON. JOSEPHINE L. STATON**

**CASE NAME:** UNILOC 2017 LLC v. INFOR, INC.

**CASE NO:** 8:19-cv-01150-JLS-ADS

<b>Matter</b>	<b>Deadline</b>	<b>Plaintiff(s) Request<sup>1</sup></b>	<b>Defendant(s) Request<sup>2</sup></b>
Disclosure of Asserted Claims and Infringement Contentions and Document Production Accompanying Disclosure (N.D. Patent L.R. 3-1(a)-(h) to 3-2(a)-(e)).	Scheduling Conference Date plus fourteen (14) days (N.D. Patent L.R. 3-1 and 3-2).	11/22/19	
Last Day to File Motions to Add Parties and Amend Pleadings without leave	Scheduling Conference Date plus sixty (60) days.	1/21/20	
Disclosure of Invalidity Contentions and Production Accompanying Invalidity Contentions (N.D. Patent L.R. 3- 3(a)-(d) to 3-4(a)-(b)).	Deadline for Infringement Contentions Disclosure plus forty-nine (49) days (adapted from N.D. Patent L.R. 3-3).	1/10/20	2/14/20
Exchange of Proposed Terms for Construction (N.D. Patent L.R. 4- 1(a)-(b)).	Deadline for Invalidity Contentions Disclosure plus fourteen (14) days (N.D. Patent L.R. 4-1).	1/31/20	2/28/20
Exchange of Preliminary Claim Constructions and Extrinsic Evidence (N.D. Patent L.R. 4- 2(a)-(c)).	Exchange of Proposed Terms for Construction plus fourteen (14) days (adapted from N.R. Patent L.R. 4-2).	2/7/20	03/06/20
Joint Status Report Regarding Technology Tutorial	Sixty (60) days in advance of the Claim Construction Hearing (Order Setting Scheduling Conference).	2/28/20	3/25/20
Completion of Claim Construction Discovery (N.D. Patent L.R. 4-4.)	Exchange of Preliminary Claim Constructions and Extrinsic Evidence plus twenty-eight (28) days.	3/6/20	4/3/20

<sup>1</sup> Uniloc 2017 does not agree with Infor's arguments, and prefers to go with the dates the Court has suggested.

<sup>2</sup> As Infor explained in the joint report, Infor will be promptly filing a renewed motion to dismiss, and a motion to stay discovery pending that motion, by October 31, 2019. Infor requests that the Court order the parties to propose a schedule after consideration of these motions. To the extent the Court is inclined to enter a schedule now, Infor proposes that the Court push its presumptive dates out a sufficient time to take into the account the fact that Uniloc, in its Amended Complaint, dropped the originally accused product and for the first time accused a new and different product. Infor also proposes that the Court build in time for expert discovery to be completed prior to the deadline for dispositive motions, for the reasons explained in the joint report.

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Joint Claim Construction and Prehearing Statement (N.D. Patent L.R. 4-3(a)-(e)).	Completion of Claim Construction Discovery plus seven (7) days.	3/13/20	4/10/20
Opening Claim Construction Briefs	Deadline for filing of Joint Claim Construction and Prehearing Statement plus seven (7) days.	3/20/20	4/17/20
Responsive Claim Construction Briefs	Deadline for filing of Opening Claim Construction Briefs plus fourteen (14) days.	4/3/20	5/01/20
Claim Construction Hearing	Twenty-five (25) days after the Responsive Brief Deadline (set for Tuesday at 9:00 a.m.).	4/28/20	5/26/20
Claim Construction Ruling Date	Projected as 94 days (approximately three months) after the hearing. The actual date is likely to vary and may be earlier or later.	7/30/20	~09/04/20
Production Related to Reliance Upon Advice of Counsel (N.D. Patent L.R. 3-7(a)-(c).)	Thirty-two (32) days after the projected Claim Construction Ruling Date (adapted from N.D. Patent L.R. 3-7).	8/31/20	10/6/20
Fact Discovery Cut-Off	Approximately one (1) month after the deadline for the Production Related to Reliance on Advice of Counsel and 18 weeks before the Final Pretrial Conference ("FPTC").	10/1/20	11/6/20 (26 weeks before FPTC)
Last Day to Serve Initial Expert Reports (unrelated to claim construction).	16 weeks before the FPTC.	16 weeks before the FPTC.	24 weeks before FPTC
Last Day to File Motions (Except <i>Daubert</i> and all other Motions in Limine).	16 weeks before the FPTC.	16 weeks before the FPTC.	16 weeks before FPTC
Last Day to Serve Rebuttal Expert Reports (unrelated to claim construction).	12 weeks before the FPTC.	12 weeks before the FPTC	20 weeks before FPTC

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Last Day to Conduct Settlement Proceedings.	9 weeks before the FPTC.	9 weeks before the FPTC.	9 weeks before FPTC
Expert Discovery Cut-Off.	8 weeks before the FPTC.	8 weeks before the FPTC.	18 weeks before FPTC
Last Day to File <i>Daubert</i> Motions.	7 weeks before the FPTC.	7 weeks before the FPTC	7 weeks before FPTC
Last Day to File Motions in Limine (excluding <i>Daubert</i> Motions).	4 weeks before the FPTC.	4 weeks before the FPTC.	4 weeks before FPTC
Final Pre-Trial Conference <b>(Friday at 10:30 a.m.)</b>			
<b>Revised: July 31, 2019</b>			