

BAKER BOTTS L.L.P.

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Attorneys for Defendant/Counterclaim Plaintiff
AGIS Software Development LLC

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **(San Jose Division)**

20 LYFT, INC.,
21 Plaintiff,
22 v.
23 AGIS SOFTWARE DEVELOPMENT LLC,
24 Defendant.

Case No. 5:21-cv-04653-BLF

**JOINT STIPULATED ~~PROPOSED~~
SCHEDULING ORDER**

Dept: Courtroom 3 – 5th Floor
Judge: The Honorable Beth Labson Freeman

Trial date: October 16, 2023

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1 Plaintiff Lyft, Inc. (“Lyft”) and Defendant AGIS Software Development, LLC (“AGIS”)
 2 submit this Stipulation and Proposed Order to set the following deadlines pursuant to Case
 3 Management Order (Dkt. 59).¹

Event	DATE or DEADLINE
Initial Case Management Conference	1/27/22
Deadline to exchange initial disclosures	2/25/22
Infringement Contentions & Accompanying Documents (Patent L.R. 3-1, 3-2)	2/25/22
Last Day to Request Leave to Amend Pleadings per F.R.Civ.P. 15	3/28/22
Exchange of Proposed Claim Terms (Patent L.R. 4-1)	4/8/22
Invalidity Contentions & Accompanying Documents (Patent L.R. 3-3, 3-4)	4/11/22
Meet and Confer to Limit Claim Terms to 10 Terms Likely to be Most Significant to the Dispute (Patent L.R. 4-1(b))	4/15/22
Exchange of Preliminary Claim Constructions (Patent L.R. 4-2)	4/29/22
Damages Contentions (Patent L.R. 3-8)	5/31/22
Parties Meet and Confer to Narrow Issues and Prepare Joint Claim Construction and Prehearing Statement (Patent 3L.R. 4-2(c))	6/3/22
Joint Claim Construction Statement Due (Patent L.R. 4-3)	6/10/22
Responsive Damages Contentions (Patent L.R. 3-9)	6/30/22
Completion of Claim Construction Discovery (Patent L.R. 4-4)	7/11/22
AGIS’s Opening Claim Construction Brief Due (Patent L.R. 4-5)	7/25/22
Defendants’ Responsive Claim Construction Brief Due (Patent L.R. 4-5)	8/8/22
AGIS’s Reply Claim Construction Brief Due (Patent L.R. 4-5)	8/15/22
Further Case Management Conference	8/18/22 at 1:30 PM
Claims Tutorial	8/18/22 at 1:30 PM
Claim Construction Hearing (Patent L.R. 4-6)	9/1/22 at 1:30 PM

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 28 ¹ The parties agree that they may seek leave to adjust the stipulated dates included herein if necessary

Event	DATE or DEADLINE
Advice of Counsel (Patent L.R. 3-7)	10/3/22
Close of Fact Discovery	1/12/23
Simultaneous Opening Expert Reports by the parties on issues where they bear the burden of proof	2/2/23
Simultaneous Rebuttal Expert Reports	3/2/23
Close of Expert Discovery	3/16/23
Final Day for Filing Dispositive Motions	4/6/23
Oppositions to Dispositive Motions	4/27/23
Replies to Dispositive Motions	5/11/23
Hearing for Dispositive Motions	5/25/23 at 9:00 AM
Pretrial Conference	9/14/23 at 1:30 PM
Trial Date	10/16/23 at 9:00 AM

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Dated: February 11, 2022

Respectfully submitted,

BAKER BOTTS L.L.P.

/s/ Jeremy J. Taylor

/s/ Vincent J. Rubino, III

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AGIS Software Development LLC*

FILER'S ATTESTATION

I, Jeremy J. Taylor, am the ECF user whose ID and password are being used to file this Joint Case Management Conference Statement. In compliance with Civil Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing.

Date: February 11, 2022

/s/ Jeremy J. Taylor
Jeremy J. Taylor

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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 14, 2022



BETH LABSON FREEMAN
United States District Judge