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15
16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **OAKLAND DIVISION**

19
20 FINJAN, INC.,
21
22 Plaintiff,
23
24 v.
25 QUALYS INC.,
26 Defendant.

Case No.: 4:18-cv-07229-YGR

~~PROPOSED~~ ORDER

Date Complaint Filed: November 29, 2018

Trial Date: None Set

Event	Agreed Proposed Date/Deadline
Finjan to file charts regarding prior and co-pending litigation involving Finjan's patents and prior claim constructions	Complete
Submit Protective Order and ESI Order	Complete
Initial Disclosures	Complete
Disclosure of Asserted Claims and Infringement Contentions; Document Production Accompanying Disclosure	Complete
Last day to join parties or amend the pleadings without leave of Court	Complete
Invalidity Contentions; Document Production Accompanying Invalidity Contentions	Complete
Exchange of Proposed Terms for Construction	10/2/19
Exchange of Preliminary Claim Constructions and Extrinsic Evidence	10/23/19
Damages Contentions	10/30/19
Joint Claim Construction and Prehearing Statement	12/4/19
Responsive Damages Contentions	12/18/19
Completion of Claim Construction Discovery	1/15/20
Claim Construction Briefs – opening brief	2/10/20
Claim Construction Briefs – responsive brief	3/16/20
Claim Construction Briefs – reply brief	4/6/20
Claim Construction Tutorial	5/6/20 4/22/2020 at 2pm (subject to the Court's availability)
Claim Construction Hearing	5/20/20 5/1/2020 at 10:00 a.m. (subject to the Court's availability)
Close of fact discovery	2 months after the claim construction order
Opening expert reports	2 months after the close of fact discovery

Event	Agreed Proposed Date/Deadline
Rebuttal expert reports	6 weeks after service of opening expert reports (subject to adjustment for holidays)
Close of expert discovery	1 month after the service of rebuttal expert reports
Last day for a pre-filing conference on summary judgment motions	three weeks after the close of expert discovery
Plaintiff's opening summary judgment briefs	three weeks after the pre-filing conference on summary judgment motions
Defendant's opposition summary judgment briefs and cross motion for summary judgment	three weeks after Plaintiff's opening summary judgment brief
Plaintiff's reply summary judgment briefs and opposition to Defendant's cross motion for summary judgment	three weeks after Defendant's opposition summary judgment brief
Defendant's reply for its cross motion for summary judgment	three weeks after Plaintiff's opposition summary judgment brief
Summary judgment hearing	Subject to the Court's availability
Final Pretrial Conference	Subject to the Court's availability
Trial	Subject to the Court's availability

IT IS SO ORDERED.

Date: July 16, 2019


Yvonne Gonzalez Rogers
U.S. District Court Judge