

EXHIBIT A

Note : This chart assumes that the Court grants Plaintiffs leave to file their Second Amended Complaint on April 23. All dates after the first date should be based upon when Plaintiffs actually file their Second Amended Complaint.

Deadline	Item
April 23, 2021	Plaintiffs file unopposed motion (“Motion”) for leave to file Second Amended Complaint
Some time after April 23, 2021	Court grants Plaintiffs’ Motion and Plaintiff files Second Amended Complaint
May 7, 2021 or two weeks after previous event	Government files Answer or otherwise responds
June 4, 2021	Plaintiffs serve preliminary infringement contentions arising from the Second Amended Complaint including for added ‘708 patent

July 2, 2021	Defendant serves preliminary invalidity contentions.
July 16, 2021	Parties exchange claim terms for construction.
July 30, 2021	Parties exchange proposed claim constructions.
August 6, 2021	Parties disclose extrinsic evidence. The parties shall disclose any extrinsic evidence, including the identity of any expert witness they may rely upon with respect to claim construction or indefiniteness. With respect to any expert identified, the parties shall identify the scope of the topics for the witness's expected testimony. With respect to items of extrinsic evidence, the parties shall identify each such item by production number or produce a copy of any such item if not previously produced.
August 13, 2021	Deadline to meet and confer to narrow terms in dispute and exchange revised list of terms/constructions.
August 20, 2021	Plaintiffs file Opening claim construction brief, including any arguments that any claim terms are indefinite.
September 10, 2021	Defendant files Responsive claim construction brief.
September 24, 2021	Plaintiffs file Reply claim construction brief.
September 27, 2021	PLAINTIFFS' PROPOSED DATE FOR COMPLETION OF GOVERNMENT'S LPR PRODUCTION
October 8, 2021	Defendant files a Sur-Reply claim construction brief.
October 15, 2021	Parties submit Joint Claim Construction Statement. See General Issues Note #8 regarding providing copies of the briefing to the Court and the technical adviser (if appointed).

October 22, 2021	Parties submit optional technical tutorials to the Court and technical adviser (if appointed). Plaintiffs propose that the parties should provide at least one month's notice to the other party if they expect to provide a technical tutorial.
October 29, 2021	<i>Markman</i> Hearing at [9:00 a.m. or 1:30 p.m.]
November 26, 2021(Day After Thanksgiving)/December 3, 2021	DATE PROPOSED BY GOVERNMENT FOR DOCUMENT PRODUCTION