

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1595-LPS
)
 LG ELECTRONICS, INC.,)
 LG ELECTRONICS USA, INC. and)
 LG ELECTRONICS MOBILECOMM U.S.A.,)
 INC.,)
)
 Defendants.)
)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1596-LPS
)
 APPLE INC.,)
)
 Defendant.)
)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1597-LPS
)
 BLACKBERRY LIMITED and)
 BLACKBERRY CORPORATION,)
)
 Defendants.)
)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1598-LPS
)
 SAMSUNG ELECTRONICS CO., LTD.,)
 SAMSUNG ELECTRONICS AMERICA, INC.)
 and SAMSUNG TELECOMMUNICATIONS)
 AMERICA, LLC,)
)
 Defendants.)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1599-LPS
)
 NOKIA INC.,)
)
 Defendant.)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1600-LPS
)
 HTC CORP. a/k/a HIGH TECH COMPUTER,)
 CORP., HTC AMERICA, INC. and EXEDEA,)
 INC.,)
)
 Defendants.)

ARENDI S.A.R.L.,)
)
 Plaintiff,)
)
 v.) C.A. No. 12-1601-LPS
)
 MOTOROLA MOBILITY LLC)
 f/k/a MOTOROLA MOBILITY, INC.,)
)
 Defendant.)

ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1602-LPS
)	
SONY MOBILE COMMUNICATIONS (USA))	
INC. f/k/a SONY ERICSSON MOBILE)	
COMMUNICATIONS (USA) INC.,)	
SONY CORPORATION and)	
SONY CORPORATION OF AMERICA,)	
)	
Defendants.)	
)	
ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 13-919-LPS
)	
GOOGLE LLC,)	
)	
Defendant.)	
)	
ARENDI S.A.R.L.,)	
)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 13-920-LPS
YAHOO! INC.,)	
)	
Defendant.)	
)	

**JOINT STIPULATION AND [PROPOSED] ORDER TO AMEND
SCHEDULING ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and subject to the approval of the Court, that the deadlines set forth in the Amended Scheduling Order (D.I. 22) shall be modified as set forth below:¹

Deadline	Old Dates	New Proposed Dates
Identify Supplemental Accused Products ²	August 30, 2013	November 12, 2018
Motions to Join Other Parties, Amend ³	February 4, 2014	November 12, 2018
Production of Core Technical Documents for Supplemental Accused Products ⁴	December 2, 2013	January 30, 2019
Supplemental Initial Claim Charts ⁵	December 6, 2013	February 13, 2019
Invalidity Contentions and Invalidating References ⁶	January 17, 2014	March 27, 2019
Exchange of Claim Terms	February 14, 2014	April 17, 2019
Exchange of Proposed Constructions	March 7, 2014	May 8, 2019
Joint Claim Construction Chart	March 21, 2014	May 22, 2019
Interim Status Report	March 21, 2014	May 22, 2019
Initial Claim Construction Briefs	April 18, 2014	June 19, 2019

¹ Arendi and the HTC defendants are working to resolve by agreement or present to the Court a briefing schedule to address the issue of whether venue is proper over the HTC defendants in light of *TC Heartland*. Arendi agrees that HTC's joining in this Joint Stipulation is without prejudice to the HTC defendants' right to challenge venue; and that it will not argue that by engaging in discussions to resolve by agreement the venue issue, by agreeing to submit a proposed schedule, or by the Court's entry of this or any other scheduling order resulting from this stipulation that the HTC defendants have waived their right to challenge venue.

² Defendants reserve all rights to move to strike or otherwise challenge any such supplementation of accused products.

³ This deadline applies only to Arendi's filing of motions for leave to amend its Complaints (1) to identify the correct corporate defendants as to Blackberry, Motorola, Nokia and Yahoo!; and (2) to assert new patents and claims against Yahoo! and Google. The respective defendants reserve all rights to oppose such motions and proposed amendments. Other than these identified amendments for which Arendi may seek leave, Arendi has agreed to seek no further amendment to the Complaints or to add additional asserted claims to those identified in the initial infringement contentions of December 6, 2013.

⁴ To the extent disputed motions to amend any Complaints are still outstanding, one or more parties to this Stipulation are permitted to and may seek to modify this deadline.

⁵ Defendants reserve all rights to move to strike or otherwise challenge Arendi's infringement contentions and claim charts.

⁶ Arendi reserves all rights to move to strike or otherwise challenge any such supplementation of Defendants' invalidity contentions and invalidating references.

Submit Technology Tutorial to The Court	April 18, 2014	June 19, 2019
Responsive Claim Construction Briefs	May 16, 2014	July 17, 2019
Claim Construction Hearing	July 11, 2014	[TBD by Court]
Substantial Completion of Document Production	May 23, 2014	August 7, 2019
Fact Discovery Cut Off	August 8, 2014	October 30, 2019
Initial Expert Reports	September 19, 2014	December 11, 2019
Rebuttal Expert Reports	October 24, 2014	January 22, 2020
Reply Expert Reports	November 21, 2014	February 29, 2020
Expert Discovery Cut Off	January 2, 2015	April 1, 2020
Case-Dispositive-Motions Opening Brief	January 30, 2015	May 6, 2020
Case-Dispositive-Motions Answering Brief		28 days after service of dispositive motion
Case-Dispositive-Motions Reply Brief		21 days after service of responsive brief
Conference Regarding Order of Trials		TBD by Court
Pretrial Order (including MILs)		14 days before pretrial conference
Jury Instructions/Voir Dire/Special Verdict Forms		3 business days before pretrial conference
First Pre-Trial Conference		TBD by Court
First Trial		TBD by Court

Dated: October 19, 2018

SMITH, KATZENSTEIN & JENKINS, LLP

FISH & RICHARDSON, P.C.

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