

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

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

RAPID7, INC., a Delaware Corporation
and RAPID7 LLC, a Delaware Limited
Liability Company,

Defendants.

C.A. No. 1:18-cv-01519-MN

STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME

Plaintiff Finjan, Inc. and Defendants Rapid7, Inc. and Rapid7 LLC (collectively, “the Parties”), by and through their undersigned counsel, and subject to the approval of the Court, hereby stipulate and agree to extend certain case deadlines, as indicated below.

The COVID-19 pandemic and resulting shelter in place laws have created substantial impediments to the Parties and their experts’ ability to complete expert reports on the current schedule. This includes the inability for experts to travel to and access Defendants’ source code, as Defendants’ facilities are currently closed through June 1, 2020. The extended deadlines do not impact the Court’s scheduled trial date.

Deadline	Current Date	Extended Date
Opening/Burden of Proof Expert Reports	4/21/20	5/22/20
Rebuttal Expert Reports	5/22/20	6/26/20
Reply Expert Reports	6/26/20	7/31/20
Close of expert discovery	7/24/20	8/28/20

Case Dispositive Motions and Daubert Motions	8/07/20	9/25/20
Joint Proposed final pretrial order	2/1/21	same
Pre-trial Conference	2/08/21 – 2 PM	same
Trial – 6-day Jury	2/22/21 -9:30 AM	same

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*Counsel for Defendants
Rapid7, Inc. and Rapid7 LLC*

Dated: April 15, 2020

SO ORDERED, this _____ day of April, 2020.

United States District Judge