

EXHIBIT 4

Dotson, David C.

From: Dotson, David C.
Sent: Wednesday, June 3, 2020 2:35 PM
To: Dotson, David C.
Subject: FW: Finjan v. Rapid7 18-1519 - Stipulation Amending Case Schedule

From: Diana Welham <Diana_Welham@ded.uscourts.gov>
Sent: Thursday, April 16, 2020 8:09 AM
To: 'Rovner, Philip A.' <provner@potteranderson.com>; Renck, Richard L. <RLRenck@duanemorris.com>
Subject: Finjan v. Rapid7 18-1519 - Stipulation Amending Case Schedule

Good Morning, Phil and Richard –

Judge Noreika has reviewed the Stipulation submitted yesterday and is requesting edits regarding dispositive motions. Her Honor would like the parties to submit letters seeking permission to file summary judgment motions. Her Honor's provisions regarding letter briefs is set forth below:

Prior to filing any summary judgment motion, the parties must submit letter briefs seeking permission to file the motion. Opening letter briefs shall be no longer than five (5) pages and shall be filed with the Court no earlier than XXX. Answering letter briefs shall be no longer than five (5) pages and shall be filed with the Court on or before XXX [no later than seven (7) days after the filing of the opening letter brief]. No replies shall be filed. Unless the Court grants leave for additional letters to be filed, each side shall present all grounds on which it seeks permission to file for summary judgment in its single opening letter brief.

Please incorporate the letter provisions into the stipulation and email me an updated PDF so that I may swap it out on the docket. Also, please change "Case Dispositive Motions and Daubert Motions" to read "Case Dispositive Motions (if permitted) and Daubert Motions." Ideally, Her Honor would like the responsive letters filed at least two weeks before the deadline to file dispositive motions, if they are permitted, keeping in mind that the September 25, 2020 date proposed is the latest date dispositive motions (if permitted) and Daubert motions can be filed without the parties losing their trial date.

If you have any questions, please let me know.

Thanks

Diana

Case Name: Finjan, Inc. v. Rapid7, Inc. et al
Case Number: [1:18-cv-01519-MN](#)
Filer: Rapid7 LLC
Rapid7, Inc.

Document
Number: [132](#)

Docket Text:

STIPULATION and [Proposed] Order to Extend Time re SO ORDERED,,,, Set/Reset Scheduling Order Deadlines,, by Rapid7 LLC, Rapid7, Inc.. (Renck, Richard)

Diana L. Welham
Judicial Administrator/Civil Case Manager
The Honorable Maryellen Noreika
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Chambers: (302) 573-6470
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