

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

FINJAN, INC., a Delaware Corporation,)	
)	
Plaintiff,)	
)	
v.)	
)	C.A. No. 18-1519-MN
RAPID7, INC., a Delaware Corporation and)	
RAPID7 LLC, a Delaware Limited Liability)	
Company,)	
)	
Defendants.)	

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 parties agree that this stipulation does not moot, has no impact on, and should not be considered by the Court in connection with Rapid7’s pending motion to extend the case schedule (D.I. 143).

The proposed deadlines do not impact the Court’s set dates for the submission of summary judgment briefing, the pre-trial conference, and trial.

Deadline	Current Date	Proposed Date
Opening/Burden of Proof Expert Reports	6/15/20	6/17/20
Rebuttal Expert Reports	7/17/20	7/20/20
Reply Expert Reports	8/10/20	8/12/20
Close of expert discovery	9/1/20	9/3/20
Opening letter briefs seeking permission to file summary judgment motions	9/4/20 (unchanged)	
Answering letter briefs regarding requests to file motions for summary judgment	7 days after opening letter brief (unchanged)	

Deadline	Current Date	Proposed Date
Case Dispositive Motions (if permitted) and Daubert Motions	9/25/20 (unchanged)	
Joint Proposed final pretrial order	2/1/21 (unchanged)	
Pre-trial Conference	2/08/21 – 2 PM (unchanged)	
Trial – 6-day Jury	2/22/21 – 9:30 AM (unchanged)	

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 September 4, 2020. Answering letter briefs shall be no longer than five (5) pages and shall be filed with the Court no more than seven (7) days after 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.

POTTER ANDERSON & CORROON, LLP

By: /s/ Philip A. Rovner

Philip A. Rovner (No. 3215)
Jonathan A. Choa (No. 5319)
1313 N. Market St., 6th Floor
Wilmington, DE 19899-0951
(302) 984-6000
provner@potteranderson.com
jchoa@potteranderson.com

*Counsel for Plaintiff
Finjan, Inc.*

Dated: June 12, 2020
6760413

DUANE MORRIS LLP

By: /s/ Richard L. Renck

Richard L. Renck (No. 3893)
222 Delaware Avenue, Suite 1600
Wilmington, DE 19801
(302) 657-4900
rlrenck@duanemorris.com

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

SO ORDERED, this _____ day of June, 2020.

United States District Judge